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THE U.S. NAVAL HOME: AN EXAMINATION OF ITS SIGNIFICANCE, ITS CLOSURE, AND THE PROBLEMS SURROUNDING ITS REUSE

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Introduction

The goals of historic preservation are often hotly debated. Opponents of the movement argue that preservation freezes society at a certain point in time and impedes progress. Others argue that preservation ordinances place inappropriate restrictions on property owners. Norman Tyler wrote of American tradition as a future oriented process that, "... does not focus on preservation, but rather on opportunism."[1] He argues that preservationists counter this idea by preserving the past, but that this does not mean preservationists are inherently opposed to growth and development. Preservationists see the past as a guide for future growth and development. To characterize historic preservation as opposed to change or future development is misleading. Rather, the goal of historic preservation is to manage change so that it responds to the historic environment in which it occurs.

Historic preservation is a broad field that overlaps with other disciplines including planning, architecture, law, archaeology, and real estate. As is often the case, preservation is a tool used by professionals from these disciplines as a means to achieve their goals. Preservation is a tool of planning and can be used to reintroduce vibrancy and economic vitality to a city. For example, Providence, Rhode Island has only begun to realize the benefits of its revitalization efforts. The River Relocation Project, spearheaded by William Warner, a Rhode Island architect, uncovered the Woonasquatucket, Moshassuck, and Providence Rivers. The Rivers were once the historic economic and transportation network of the city, but by the 1960s they had become an unattractive resource. Warner realized the potential opportunity that existed

within the rivers and capitalized upon this natural asset. This project cost $40 million and its focal point was Waterplace Park, a four acre park that extends two miles along the rivers.[2] The project spurred other changes in downtown Providence including a new skating rink adjacent to Kennedy Plaza and the Providence Place Mall. In addition the project began to restore economic and social health to the city. This example demonstrates that preservation planning is pro-active rather than reactive.

The goal of preservation planning is to retain elements inherent in our cultural resources and to direct change in a way that allows historic sites to convey the heritage they represent. Participants involved in preservation planning vary from project to project, but often include planners, preservationists, community interest groups, government officials, and developers. At times these players form alliances in order to advance their collective and individual goals, but progress is not always possible.

Developers and preservationists are often at odds because they often have very different goals. Profit quest drives developers, as their main objective is to earn the best returns on their investments. Preservationists look to protect significant cultural resources and/or manage change to those resources. Often developers build on vacant and historically insignificant sites and create a positive change in a neighborhood. However, what happens when there is a historically significant site that also interests preservationists? The preservationist wants to ensure the property is maintained, reused, and developed in a sensitive manner. While the developers are not necessarily opposed to this objective, it is not necessarily their priority unless linked to enhancing economic

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[1] Norman Tyler, Historic Preservation, (New York: W.W. Norton & Company, 2000), 12.

return. The difference in objectives can be difficult to manage, lead to conflict, possible litigation, and take years to resolve. Such results do not benefit either party, and the building or site in question suffers as it deteriorates over time. This thesis will attempt to answer the question of what happens when developers and preservationists, both of whom have specific, and at times, conflicting interests, approach and plan for the reuse of large, historic urban sites? To address this topic, I will use a case study, the United States Naval Home (Naval Home) in Philadelphia, Pennsylvania.

The Naval Home is located on a twenty-acre site at 23rd Street and Grays Ferry Avenue in South Philadelphia. William Strickland designed Biddle Hall (1826), the main structure on the site. Strickland also designed the two adjacent dependencies, the Surgeon General's (1844) and Governor's residences (1844). John McArthur, the architect of Philadelphia City Hall designed Laning Hall (1868), located west of and behind Biddle Hall. Laning Hall served as a hospital and dormitory.[3] In 1971 the site was listed on the National Register of Historic Places and in 1976 the complex was designated a National Historic Landmark. The United States Navy occupied the site until 1976, when they relocated to Gulfport, Mississippi.[4] At that time, the Navy declared the property "excess" and the General Service Administration (GSA), the federal agency that manages surplus property owned by the federal government, assumed control.[5] The GSA

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[2] D. Morgan McVigar, "Providence Renaissance Riverside Ambiance Enfolds Dedication of Downtown's Memorial Park," *The Providence Journal*, June 21, 1996, B1.

[3] Wallace Roberts and Todd, Day and Zimmerman Associates, Hammer, Siler, George Associates, , *Technical Appendix U.S. Naval Home Reuse Study, Section Two: Historic Significance*, September 1, 1980, 21.

[4] T.J. Doyle to United Stated Department of the Interior, National Park Service, July 23, 1974, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

[5] Edwin L. Shellenberger to A. Edward Simon, September 1, 1976, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

followed its established procedure for the disposal of surplus federal property, first offering the site to all federal, state, and local governments. Normally, in cases such as this one, the local government does take responsibility for the site. However, the City of Philadelphia was not able to negotiate a contract with the GSA. The details of the negotiations between the City and the GSA will be further discussed in Chapter 2. Consequently, the GSA first put out a request for bids first in 1981, but none of the bids were acceptable. They put the site out to bid again in 1982 and there was one bidder, Toll Brothers, Inc., a suburban-residential developer then headquartered in Horsham, Pennsylvania.[6] Today Toll Brothers, Inc. maintains its headquarters is in Huntingdon Valley, Pennsylvania. Since 1982, Toll Brothers has not been able to obtain the necessary approvals from the involved historic agencies to develop the site. In the past twenty years the site has remained vacant, and because little has been done to maintain the buildings, they continue to deteriorate. Only the three Strickland buildings remain at this time as Toll Brothers demolished Laning Hall in 1991. Nonetheless, the site serves as an important reminder of architectural, military, and social history in the United States and Philadelphia. In addition, as the work of one of the most significant early nineteenth Century American architects, it is important to maintain and preserve these landmark structures as examples of the substance of urban life.

[6] Toll Brothers Bid for Naval Home, March 10, 1982, GSA Control No: 3-N-PA-684, Contract No. GS-OW-DR-(P) 12218A, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

This thesis will address the following questions to understand the difficulties in the reuse and development of Naval Home: who are the parties involved with the potential reuse of the Naval Home and what are their roles and interests? What were the proposals advanced in the last twenty years and their respective outcomes? Is it still possible to reuse the historic structures and develop the site and if so, what actions are necessary for all parties to come to agreement so that the site can be successfully reused?

In order to discuss these questions, this thesis will provide an overview of the site's history and explain its architectural and social significance to establish the values that a development scheme should preserve. An introduction of the parties and their involvement in the process will follow. It should be noted that I made an attempt to contact all of the organizations involved to understand their role and perspective on the site. While I was fortunate to visit many of these agencies and conduct interviews with individuals directly involved over the past twenty years, there were individuals that I was not able to contact. Perhaps future work on the Naval Home may provide additional insight on the events of the past years, but for the purpose of this thesis, I gathered sufficient information to draw preliminary conclusions. The agencies I visited which were involved with the Naval Home are:

- Philadelphia Historical Commission
- Pennsylvania Historical and Museum Commission, Bureau of Historic Preservation
- Preservation Alliance for Greater Philadelphia

I also conducted interviews with an individual from each agency below, but did not examine their files:

- Federal Advisory Council on Historic Preservation, Washington, D.C.

- National Park Service, Washington, D.C.

I held interviews and conversations with individuals associated with the project over the past twenty years including:

- Andrew Terhune, Special Projects Manager, Toll Brothers, Inc.
- David Knapton, Planner, Philadelphia Planning Commission
- Charlene Dwin Vaughn, Advisory Council for Historic Preservation
- Dan Deibler, Chief, PA Historical and Museum Commission, Bureau for Historic Preservation
- Bonnie Wilkinson Mark, Historical Architect, PA Historical and Museum Commission, Bureau for Historic Preservation
- Richard Tyler, Philadelphia Historical Commission
- Michael Auer, National Park Service, Washington, D.C.

The help and insight of the above mentioned parties played a key role in the development of this thesis.

After a discussion of the participants, this thesis will examine the past proposals and the challenge of creating a successful development program, including a discussion of the effect on the site of twenty years of abandonment and neglect. The owner, Toll Brothers did not permit a site visit, but I did obtain photos at the Pennsylvania Historical and Museum Commission that depict the site in 1983 and in 2000.

By examining the events surrounding the potential redevelopment of the Naval Home over the past twenty years, I will trace the chronology of the past proposals for the site and their outcomes. I will also provide a larger understanding of the complexities behind the rehabilitation and redevelopment of the Naval Home. In my final conclusions, I will suggest a framework that will provide a structure for the approval process and demonstrate that the Naval Home is still a prime real estate opportunity.

Chapter 1: Overview of the US Naval Home (1735 – 1976)

The rich and varied history of the US Naval Home (Naval Home) in Philadelphia can be traced back to William Penn. Penn founded the city of Philadelphia in 1682 and divided the city into blocks from the Delaware River to the Schuylkill River in order to sell it so that he and his heirs could live off the profit. In 1683, Penn's surveyor, Thomas Holme laid out the city.[7] **(Figure 1)**

While the development of Philadelphia began on the banks of the rivers as Penn planned, development did not spread equally from the Schuylkill and Delaware Rivers. Instead, the heaviest growth concentrated in the eastern portion of the city adjacent to the Delaware River and the city's main business district. **(Figure 2)** The western portion of the city bordering the Schuylkill Rivers was primarily undeveloped land until the 1860s.[8] The site of the Naval Home was originally part of this land owned by the Penn family.

Early History

The first owner to develop the land that would later become the site of the Naval home was the Pemberton family. The Pembertons purchased the site before the Revolutionary war and built a mansion to serve as the family summer home in the "country." This mansion became known as "The Plantation." **(Figure 3)**

[7] George Tatum, Penn's Great Town, (Philadelphia: University of Pennsylvania Press, 1961), 18.
[8] A map by Samuel Smedley dated 1862 depicted residential development east of 19th Street, but not in the area immediately adjacent to the Naval Home. One of the first maps to depict the beginnings of development west of 19th Street and south of South Street was drawn by G.M. Hopkins in 1876. Map Collection, Free Library of Philadelphia.

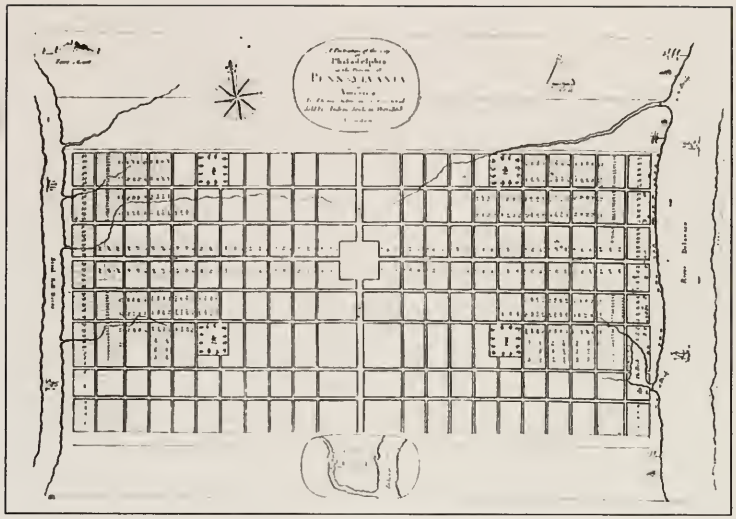

Figure 1 Thomas Holme Plan of Philadelphia, 1682.

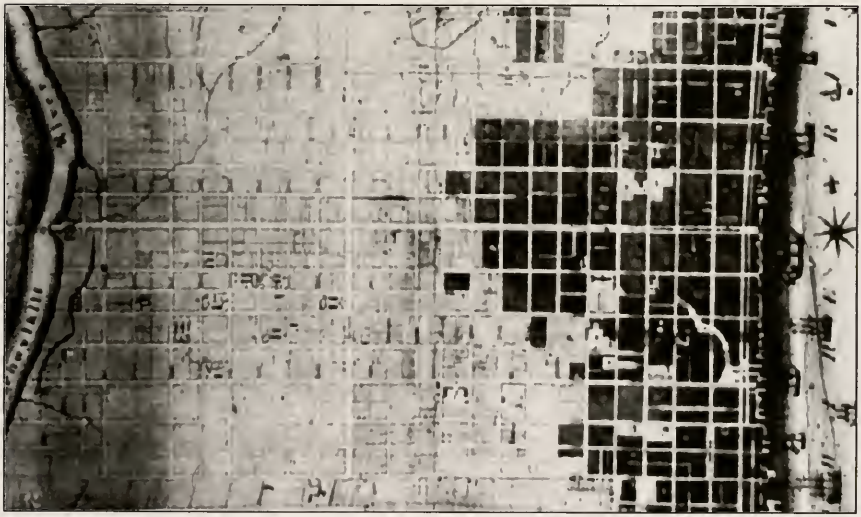

Figure 2 Section of *The Plan of the City and Suburbs of Philadelphia*, Thomas Mifflin, 1793.

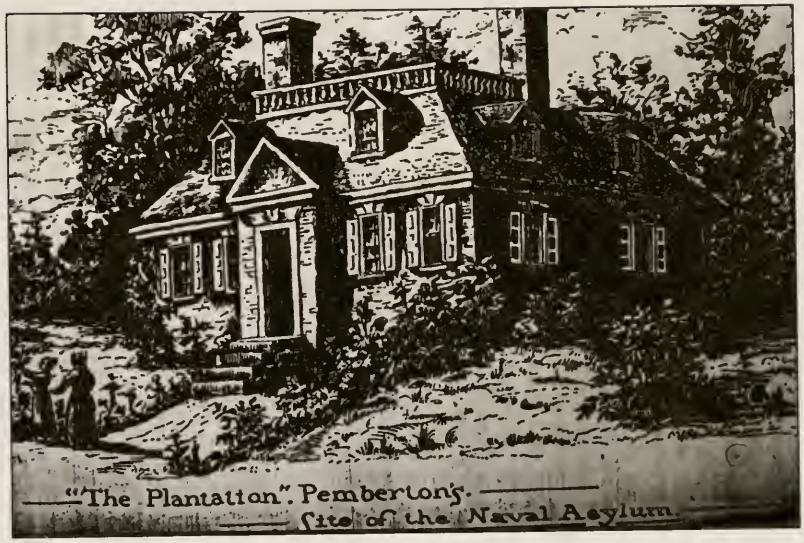

Figure 3 The Pemberton Plantation.

The house and land remained in the hands of the Pembertons during the Revolutionary War when British soldiers occupied it. Pheobe Pemberton, the wife of James Pemberton, managed the property during the war. Upon the death of James Pemberton in 1808, John Snowden bought the house and land. In 1812, Snowden sold the property to Timothy Abbott who sold the land, roughly 23 acres, to the U.S. Government in 1826 for $17,000.[9] The site purchased was a trapezoidal tract of land located to the south of South Street (then named Cedar Street). The site was bounded by Banbridge Street (then named Shippen Street) to the North, Grays Ferry Avenue to the east, along the Schuylkill

[9] Edward Shippen, M.D., U.S.N., "Some Account of the Origin of the Naval Asylum at Philadelphia," *The Pennsylvania Magazine of History of Biography* 7, No. 2 (1883): 123.

River for 460 feet to the west, and its southern boundary was a straight southeasterly line from there to Grays Ferry Avenue.

Before the federal government purchased the property from Abbott, the federal government made provisions to care for the sick and wounded of the Army and Navy. In 1798 the federal government assessed merchant marines twenty cents a month to establish a "Naval Hospital Fund." The federal government designated these funds to establish facilities for the care of the sick and wounded of the Navy at federally owned naval bases. In 1799 the government established a Naval Pension Fund and in 1800 the twenty cents assessment extended to all seamen in the Navy. Ten years later, in 1810, Congress passed an act that appointed the Secretaries of War, Navy, and the Treasury to a "Board of Commissioners of Naval Hospitals." The board assumed control of the Naval Pension Fund along with $50,000 from the Marine Hospital Fund. One year later, the Act of Feb. 26, 1811 authorized the board "...to acquire sites, and buy or build hospitals, and this Act of 1811 requires one of the establishments to provide a permanent 'Asylum' for 'decrepit and disabled naval officers, seamen, and marines.'"[10] Thus, in 1826 Secretary of the Navy Samuel L. Southard authorized Surgeon Thomas Harris to purchase the property from Abbott as the site for the future Naval Asylum (later known as the US Naval Home). Once the sale was complete, patients and staff began to move into the Pemberton Mansion, the only building on the site.[11] Shortly after the occupation of the mansion, in December 1826, William Strickland, an architect working in

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[10] Shippen, 127.

[11] Wallace Roberts and Todd, Day and Zimmerman Associates, Hammer, Siler, George Associates, *Technical Appendix U.S. Naval Home Reuse Study, Section Two: Historical Significance*, September 1, 1980, 6.

Philadelphia, wrote to Secretary of the Navy Southard and gave a detailed estimate for the cost of construction for his design of Naval Asylum.[12] In 1827 Strickland and Surgeon Thomas Harris were named the Commissioners of the project.

William Strickland

In 1826, when the Navy purchased the site for the care of their retired seamen, William Strickland had already completed his first major architectural commission, the Second Bank of the United States in Philadelphia. **(Figure 4)** Agnes Addison Gilchrist, author of William Strickland, Architect and Engineer, 1788 - 1854, wrote, "The Bank was and is one of the finest buildings designed and built in this country."[13] This commission established Strickland's reputation as one of the best architects in the country. Other projects soon followed, and Strickland was well on his way to establishing himself as one of the preeminent American architects of the nineteenth Century.

Strickland received no formal education in architecture, but rather trained under Benjamin Henry Latrobe. Though Latrobe initially studied engineering, he developed an interest in architecture when he traveled to Germany France, and Italy.[14] Latrobe emigrated to the United States in 1796 and in 1798 he moved to Philadelphia. Latrobe established himself as a talented architect and taught several pupils including Strickland. Along with working in Philadelphia, Latrobe worked on the U.S. Capitol in Washington,

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[12] Agnes Addison Gilchrist, William Strickland, Architect and Engineer, 1788 - 1854, Enlarged edition, (New York: Da Capo Press, 1969), 73 - 74.
[13] Gilchrist, 4.
[14] Marcus Whiffen and Frederick Koeper, American Architecture: Volume 1, 1607 - 1860, (Cambridge, MA: MIT Press, 1984), 134.

DC at the request of President Thomas Jefferson.[15] Latrobe employed Strickland's father, John, as a carpenter on one of his projects, the Bank of Pennsylvania, from 1797 to 1801. Fortunately for Strickland, this led to his apprenticeship with Latrobe from 1803 to 1805. From an early age Strickland exhibited a natural aptitude for drawing and painting and this attracted Latrobe. Though Latrobe had a high opinion of Strickland, the apprenticeship did not end on a good note as Gilchrist described Latrobe's opinion of his pupil as "...undependable, independent, and difficult."[16]

Figure 4 William Strickland, Portrait by John Neagle, 1829.

[15] Ibid.
[16] Gilchrist, 1.

In 1805 Strickland left Latrobe's office without giving notice and Latrobe wrote him a letter asking he return to collect his things and return Labrobe's keys.[17] Whether Strickland returned is unknown, but by 1808 he had his first architectural commission, the Masonic Hall on Chestnut Street. (**Figure 5**) Inspired by Gothic architecture, this building was a departure from Greek Revival, the most popular style used by architects during this period.

Figure 5 Masonic Hall, 1808 - 1811.

[17] Gilchrist, 2.

Strickland later designed his most important buildings, which included the Naval Asylum, in the Greek Revival style.[18] After completing Masonic Hall, Strickland worked to establish himself as an architect, and in 1818 he entered and won the competition for the Second Bank of the United States. **(Figure 6)** During the six years he worked on the bank he also had other commissions including four churches and the Chestnut Street Theatre. Later in his career he designed the Philadelphia Exchange (1832 – 1834) **(Figure 7)** and the Tennessee State Capitol (1845 – 1859). **(Figure 8)** These buildings were Strickland's most important works and they are all characterized as Greek Revival.

Figure 6 Second Bank of the United States, 1818 - 1824.

[18] Gilchrist, 31.

Figure 7 The Philadelphia Exchange, 1832 - 1854.

Figure 8 Tennessee State Capitol, 1845 - 1859.

Gilchrist explained why these three buildings and the Naval Asylum were connected. **(Figure 9)** These commissions "...-the Second Bank of the United States, the Naval Asylum, the Philadelphia Exchange, and the Capitol at Nashville-were built under his direct and daily superintendence."[19] This is important because along with his talent as an architect, three qualities contributed to Strickland's reputation: he was an accurate estimator, he completed buildings on time, and he insisted on good materials and construction. In addition, contrary to Latrobe's opinion, many thought he had an agreeable personality and this made him more attractive to clients.[20]

Figure 9 U.S. Naval Asylum, Biddle Hall, View of front lawn and east façade, 1826 - 1838.

[19] Gilchrist, 30.
[20] Gilchrist, 21, 27.

Early Development of the Site, 1826-1833

In December 1826, William Strickland submitted a sketch plan to Secretary of the Navy for the Asylum.[21] **(Figure 10)** The original drawings remain in the National Archives in Washington, D.C.

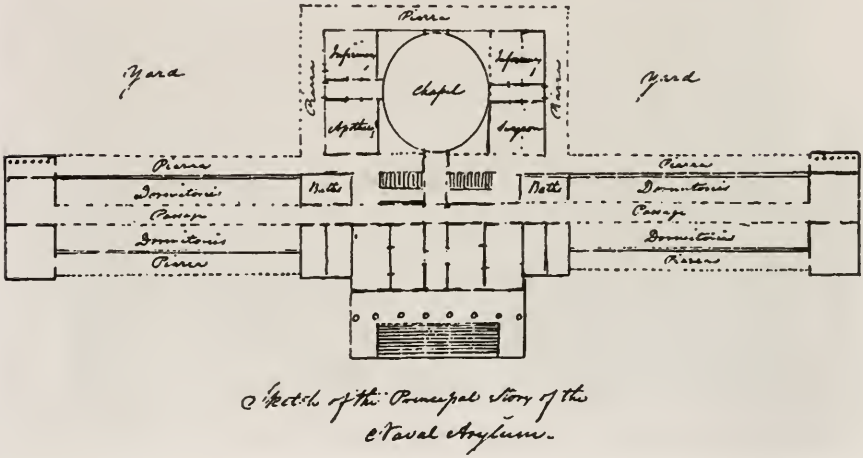

Figure 10 William Strickland's sketch plan for the Naval Home, 1826.

One of Strickland's younger brothers, George, also made plans for the Asylum and was unhappy when Strickland incorporated his ideas into the final design. However, George earned $600 a year as Clerk of the Works for the project and this appeased him. Strickland earned $100 a month as the supervising architect.[22] As the Navy requested, Strickland designed the building to serve as a home and hospital for retired seamen.

[21] Gilchrist, 7.
[22] Ibid.

Strickland's plan called for a central square building with a portico. The design of the portico called for eight fluted Ionic columns. The portico, perhaps the most expressive element of the design, was the most obvious Greek Revival element. **(Figure 11)**

Figure 11 Main Entrance and portico of Naval Home, East Elevation.

The central core housed the public rooms, the auditorium, the dining room, and the officers' rooms. Off of the central building are two wings, both identical. **(Figure 12)** The wings housed the sleeping quarters and were three stories tall. At the ends of the wings, there were recreation and common rooms for the men to gather.

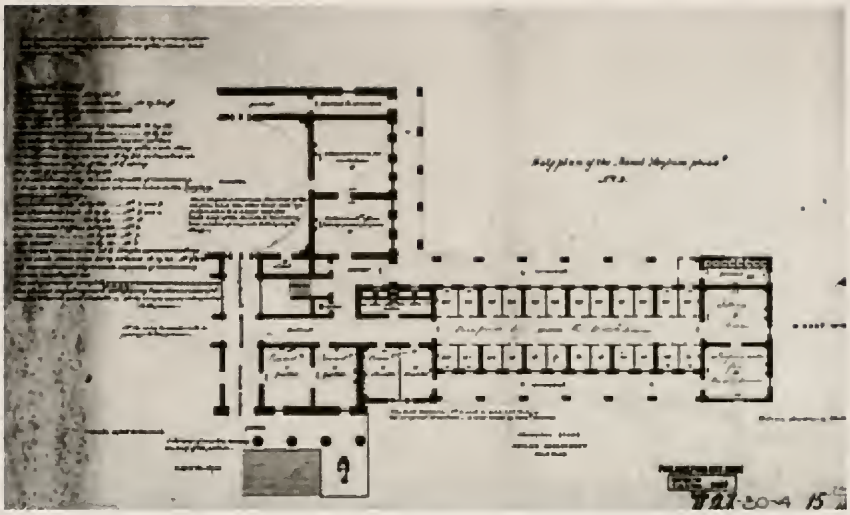

Figure 12 East Wing of the first floor of Biddle Hall, William Strickland, 1826.

One innovation of the design was the balconies that opened off of each floor and allowed the men to get fresh air when the weather was inclement or they were ill. **(Figure 13)** The building was fireproof, one of Strickland's main concerns with all his buildings was that they be fireproof.[23] The stones used included granite for the basement and Pennsylvania marble in the upper stories. The ceilings were vaulted or domed and the construction was masonry.

Figure 13 Detail of Verandas, West Wing.

Strickland preferred to work in traditional materials such as marble and brick, but he used 88 cast iron columns to support the verandas of the Naval Home. This was a departure from his earlier work, notably the Second Bank of the United States, where he did not use structural iron. However, in his later work, including the Capitol in Nashville and the two dependencies built on the site of the Naval Home, he used iron as the primary structural element. Strickland's work is important as a reflection of his time and the new materials that emerged with technological innovations of the nineteenth century. The advances in technology encouraged Strickland and other architects to experiment with new materials such as iron. As Gilchrist wrote of Strickland's work,

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[23] Gilchrist, 38.

> Strickland's approach to architecture was practical; his first concern was for the plan to be as useful as possible, and his second, for the construction to be lasting and fireproof. He extended this utilitarian attitude to architectural elements. Among his writings there are several paragraphs which deal with columns and they are sufficient to show that he was not beguiled by novelty, but looked on columns as an element of support which should proclaim their function.[24]

Strickland expressed this utilitarian attitude in his design of the portico of the Naval Asylum. In addition the design of the building reflected Strickland's ability to create a structure that was both functional and beautiful. Strickland oversaw construction of the Naval Asylum until 1829.[25] In 1833, though the upper floors were not complete, a portion of the building was occupied.[26]

In addition to the main building, Strickland designed the parade grounds, roads, and sidewalks on the site. **(Figure 14)** Though these elements may seem secondary to the main building, Strickland emphasized their layout so that they are as significant to the site as the main building. The parade ground was the central heart of the site, where the community gathered. When Strickland first designed the Asylum he also defined the lawn with a curving drive. In the center of the lawn there was a flagpole, and over the years other military objects such as cannons and anchors occupied the grounds. The lawn was a stage for Strickland's buildings and unified the site. In addition to complimenting Strickland's buildings, the lawn also made the site visually accessible to the public.

In 1838, Secretary of the Navy J.K. Pauling asked Commodore James Biddle to take command of the asylum under the title of Governor.[27] Under his tenure the building

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[24] Gilchrist, 38.
[25] Wallace Roberts and Todd, 8.
[26] Shippen, 132.
[27] Wallace Roberts and Todd, 9.

was completed. Biddle also maintained the grounds of the site and re-planted trees that were cut down during the severe winter of 1836-37.[28]

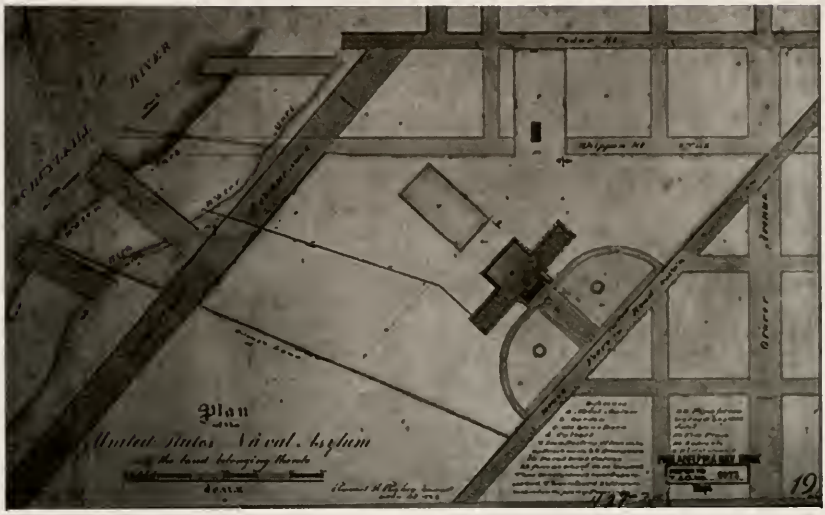

Figure 14 Site Plan of Naval Home showing Pemberton Mansion and Biddle Hall, 1836.

By re-planting the fruit trees that once occupied the site, Biddle recognized their importance and contribution to the design of the front lawn. He also oversaw the demolition of the old Pemberton Mansion in 1836. Under Biddle's administration, midshipmen attended classes at the asylum, one of the first formal attempts to educate seamen. The midshipmen in Philadelphia were not alone in this, as Naval officers also attended classes in the Boston and Brooklyn Naval Yards. All of these classes ended when the Naval Academy in Annapolis, Maryland opened in 1845. Commodore Biddle left the Naval Asylum in 1842; to honor him as the first Governor of the Naval Asylum, the main building was named Biddle Hall.

[28] Wallace Roberts and Todd, 9.

Evolution of the Site, 1842 - 1976

In 1842 the Secretary of the Navy asked Strickland to prepare a plan to divide the building into two distinct sections.[29] To accommodate the differences between the Asylum and the Hospital, Strickland proposed a partition across the center of the main corridor. **(Figure 15)** The idea was each institution would have its own space. The North Wing was for the Asylum while the South Wing was for the Hospital. The symmetrical plan easily lent itself to this adaptation as there were already separate kitchen and dining facilities in each wing. Completed in 1842, this division only lasted two years before it was removed.[30]

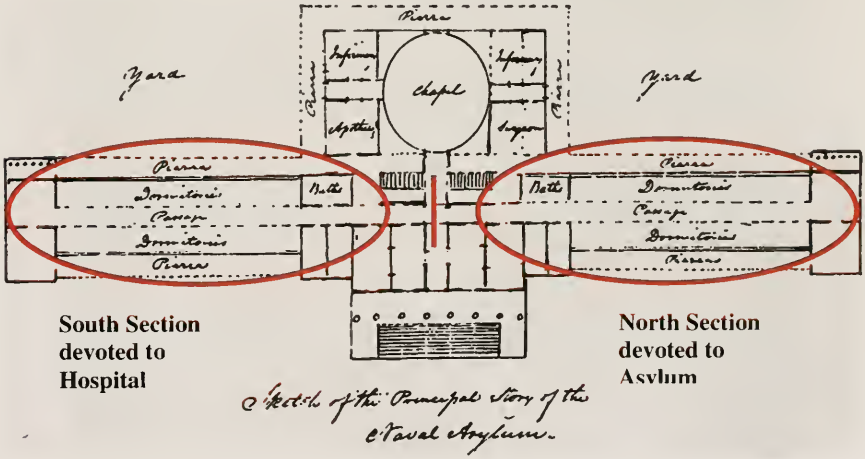

Figure 15 Plan highlighting location of partition from 1842 to 1844.

[29] Wallace Roberts and Todd, 10.

In 1844 Strickland designed the Governor's and Surgeon General's residences that flank the main building. **(Figure 16)** With the addition of the two residences, Strickland established a strong relationship between the three structures and again stressed the frontal lawn and view of the site from Grays Ferry Avenue. **(Figure 17)**

Figure 16 The Governor's Residence (above) and the Surgeon General's Residence (below) in 1983.

[30] It is unclear why the partition was torn down, but as reported by Historic American Buildings Survey the partition was removed on March 1, 1844.

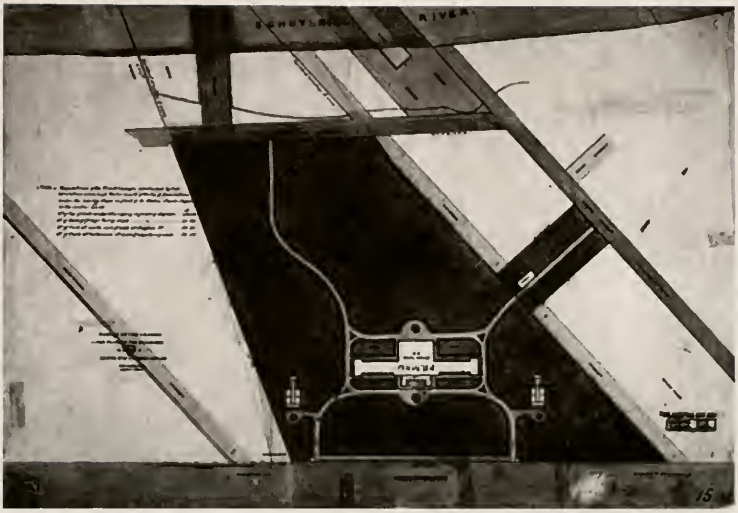

Figure 17 Site plan of the Naval Home, ca. 1844.

In addition to the relationship among the buildings, Gilchrist describes how Strickland experimented when he designed the interior details of the two residences. Following the fashion of his times, Strickland designed long, narrow drawing rooms. Often these rooms were divided into a front and back parlor by doors. In a letter to the Secretary of the Navy, Strickland described how the long drawing rooms were divided in the center by two columns, and that he suggested using a curtain to divide the space. On the other side of the house, there was an identical long, narrow room where Strickland used large double hung doors to divide the office and dining room.[31] **(Figure 18)**

Figure 18 Double Sitting Room divided by columns, Governor's Residence.

Extra material from the construction of the two residences led to the construction of two small stone gatehouses on Grays Ferry Avenue. These gatehouses contribute to the larger ensemble of buildings and frame the public frontal view from Grays Ferry Avenue. These two small structures are similar in detail to the two residences. Both had corner pilasters and recessed wall panels. Along with the gatehouses, Evans and Watson, a Philadelphia blacksmith, designed the decorative cast iron work for the fence between the gatehouses at this time.[32] This decorative cast iron fence capped a marble wall. **(Figure 19)**

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[31] Gilchrist, 41.
[32] Wallace Roberts and Todd, 10-11.

Figure 19 Iron fence separating Grays Ferry Avenue and Naval Asylum.

As the site itself became more developed, its surroundings also developed, as Sutherland Street (today Schuylkill Avenue) and Shippen Street (Banbridge Street) were paved. By 1860, there were 146 beneficiaries living on the site and during the Civil War (1861-1865) both the number of beneficiaries and hospital patients increased.[33] Another building was needed at the site and the Bureau of Medicine and Surgery requested funds for the construction of a new hospital on the grounds of the Naval Asylum. In 1864, Congress appropriated $75,000 for the construction of this building.[34]

John McArthur, Jr., a prominent Philadelphia architect was selected to design the new hospital. Though McArthur became most well known for his design of Philadelphia

[33] Wallace Roberts and Todd, 13.
[34] Ibid.

City Hall (1872 – 1890), he designed several hospitals both during and after the Civil War. The hospital McArthur designed for the Naval Home called for an elaborate ventilation system. Through energy provided by steam boilers, fresh unheated air was drawn into the building and heated air was exhaled out of the building.[35] McArthur's building for the Naval Home, completed in 1868, cost $172,000.[36] **(Figure 20)**

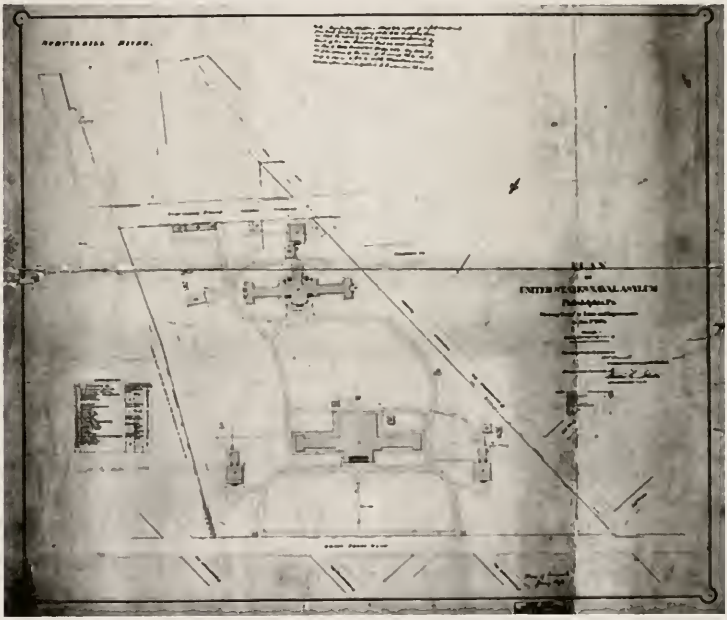

Figure 20 Site Plan of Naval Asylum, ca 1878. Note the addition of Laning Hall.

This building was a good example of the so-called Second Empire style, popular with American architects for public buildings after the Civil War. Though more restrained than Philadelphia City Hall, this Second Empire building complemented the

[35] Wallace Roberts and Todd, 22.
[36] Wallace Roberts and Todd, 13.

Greek Revival Biddle Hall. Though more restrained than Philadelphia City Hall, this Second Empire building complimented the Greek Revival Biddle Hall. **(Figure 21)**

Figure 21 Exterior view of Laning Hall.

In addition, the building created a cushion between the Naval Asylum and Naval Hospital. The hospital operated on the site until 1921 when it moved to the Philadelphia Naval Yard. Under the administration of Governor Laning, the Works Progress Administration renovated the building in the 1930s to house beneficiaries. In honor of the Governor, the building was named Laning Hall. Laning Hall was the most significant building added to the site after the Governor's and Surgeon General's residences. Following acquisition of the site Toll Brothers argued that in order to save the Strickland buildings demolition of Laning Hall was necessary, and in 1991 it was torn down.[37]

[37] Ralph Cipriano, "Naval Home's Neighbors say site is going to seed," *The Philadelphia Inquirer*, June 10, 1996, B5.

Throughout the second half of the nineteenth century and the beginning of the twentieth century, new buildings were built to support the function of the Naval Asylum. Among those were a boiler house, stable, storage sheds, greenhouses, and a pavilion. In 1889 the Naval Asylum became known as the U.S. Naval Home. In 1890 a proposal came forward to add a new wing to Biddle Hall. This new wing provided a new kitchen, baths with hot running water, and separate quarters for female staff. In addition the annex provided enough space so that steam heating could be introduced into the building. Temporary hospitals and a Red Cross building were built on the site during World War I.[38] An inventory of 1923 shows these structures on the site. **(Figure 22)** The site operated as a home for retired seamen until 1976 when the Navy moved to new quarters in Gulfport, Mississippi.

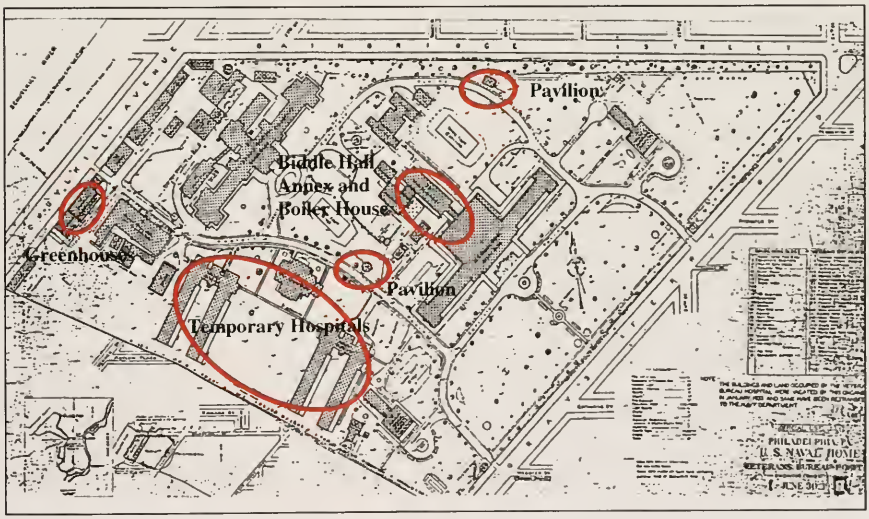

Figure 22 Site Plan, 1923. Note the addition to Biddle Hall, the temporary hospitals, the two pavilions, and the greenhouses.

[38] Wallace Roberts and Todd, 14.

GSA Disposal Process, 1976 - 1982

In 1974, Captain T.J. Doyle, Acting Commanding Officer of the Navy, wrote a letter to the National Park Service in which he explained the Navy's intention to relocate and leave the Naval Home.[39] Doyle indicated that if the Department of Defense did not need the property, the Navy would report the property to the General Services Administration (GSA) for disposal. The Navy identified no need they reported it to the GSA, the federal agency that oversees the disposal of surplus federal property. The GSA followed standard procedure for the disposal of surplus federal property and made the site available to Federal, State, and local government bodies for acquisition. In the next several years, there were many efforts on the part of the GSA, the Federal Advisory Council on Historic Preservation (ACHP), the City of Philadelphia, the Philadelphia Historical Commission, the National Park Service (NPS), and the Pennsylvania Historical and Museum Commission, Bureau of Historic Preservation (SHPO) to determine the best possible way to handle the site as they all acknowledged its historical significance. The site was listed on the National Register of Historic Places as a National Historic Landmark in 1976. The site was also listed on the registers of the Commonwealth of Pennsylvania and the City of Philadelphia. The primary reason the site was included on these registers was the architectural significance of three buildings: Biddle Hall, the Governor's Residence, and the Surgeon General's Residence. Also mentioned were the gatehouses and wall that surrounds the property. The secondary reason for the site's

[39] T.J. Doyle to United Stated Department of the Interior, National Park Service, July 23, 1974, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

inclusion on the registers was its role as the first institution in the United States to provide care for the men who served in the armed forces.

Though no immediate reuse of the site was proposed, several groups expressed concern about the condition of the historical buildings. The Philadelphia Chapter of the American Institute of Architects (AIA) wrote a letter in 1976 to Rear Admiral Clyde Van Ardsdall, Jr. of the Navy that listed three actions to take to preserve the fabric of the historic buildings. The first recommendation was to ensure the buildings were weather tight from wind and water penetration. The second suggestion was to maintain a temperature of no less than 55°F to prevent plaster from cracking and spalling, pipes from bursting, and tiles and stones from moving. The third recommendation was to secure the site with guard and alarm service in order to deter vandals.[40] The Navy did take measures to protect the site. Ardsdall responded to the AIA and listed eight actions taken by the Navy to protect the site.[41] Despite the concern for the site, the GSA was unsuccessful in transferring it in this period, though there were suggestions for the site's reuse by different organizations. The Department of Labor expressed an interest in the Naval Home as a site for a Jobs Corps training program.[42] They were not able to secure the clearances for the transfer. At the same time, South Philadelphia Health Action, a public health organization, proposed a geriatric center for the site.[43]

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[40] Alvin Holm to Rear Admiral Clyde Van Arsdall, Jr., September 2, 1976, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[41] Rear Admiral Clyde Van Arsdall, Jr. to Alvin Holm, September 10, 1976, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[42] Environmental Assessment, U.S. Naval Home, Nov. 21, 1980, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[43] Ibid.

During the period from 1978 to early 1981, the GSA put most of its effort into working out an agreement with the City of Philadelphia. In April 1978, the City first indicated an interest in acquiring the Naval Home. The City wanted to use the property for recreational purposes. The Department of the Interior, Heritage Conservation and Recreation Service rejected that proposal because it called for the placement of picnic tables on the front lawn and the erection of an 8-foot chain-link fence around the buildings.[44] Upon this rejection, the City requested time to conduct a reuse study of the Naval Home. Three planning firms, Wallace Roberts and Todd, Day and Zimmermann Associates, and Hammer, Siler, George Associates, conducted that study from 1979 to 1980. A survey conducted as part of the study showed that many of the small ancillary buildings still stood on the site. **(Figure 23)** The temporary hospitals built on the lawn behind the Surgeon General's Residence were no longer standing.

[44] Amendment Number 1 to Disposal Plan, U.S. Naval Home, December 4, 1980, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

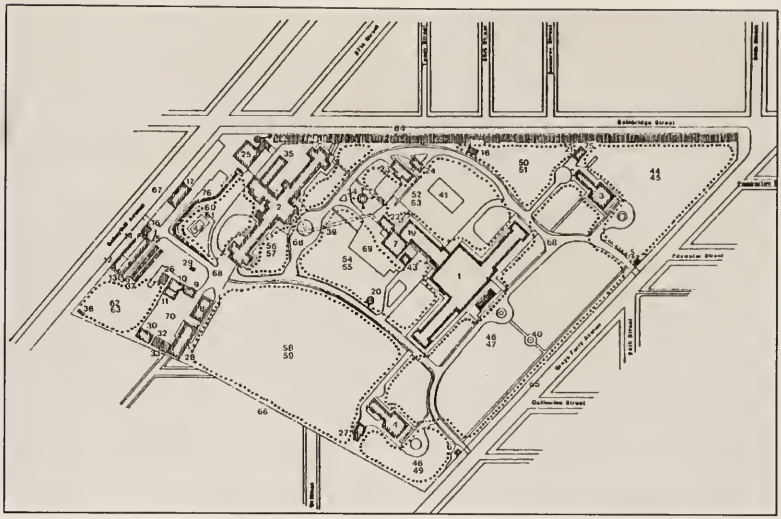

Figure 23 Site Plan, 1980.

The main conclusion of the 1980 study was that the buildings could be reused for residential, commercial, and recreational uses, but that the site was not suitable for a geriatric facility. This conclusion posed a problem for the City because the surrounding community wanted to see a nursing home on the site.[45] In a reuse study completed in 1980 by Andrew Kinzler/Land Planning, the final recommendation favored the reuse plan put forward by South Philadelphia Health Action for a nursing facility. The City stated their intention to acquire the site on June 10, 1980, and the GSA informed the City that they were obtaining an appraisal and the City should do the same. In February 1981, the GSA sent the City an Offer for Purchase for $2.29 million cash subject to historic

[45] Interview with David Knapton, October 12, 2001.

preservation covenants. GSA requested a response by April 13, 1981.[46] The City again re-affirmed its interest in the site and asked for more time to obtain an appraisal. The City's offer came on June 30, 1981 and was for $700,000 with 10% payable upon acceptance. The City wanted to defer the balance without interest for 5 years. This was unacceptable to the GSA and on July 15, 1981, "...the City's proposal was rejected and negotiations terminated by GSA. The City was told the property would be offered by sealed bids and that they would be welcome to submit a bid if they still wished to acquire the Naval Home."[47] The GSA could not justify further negotiations with the City and ongoing maintenance costs, as during this period the GSA paid for the protection and maintenance of the site at a cost of $341,750.[48] The GSA acknowledged the benefits that a sale to the City would have had:

> The sale of the property to the City would give municipal planners the most control over the course of future development in the area, whereas a sealed bid sale would lessen this control. Furthermore, the City would be obligated to take more extensive steps in trying to use the buildings than would a private developer.[49]

Both the cost of maintenance the GSA incurred over the five years they held the Naval Home and the increase in the market value of the site due to intense development in the adjoining neighborhood to the north factored into GSA's decision to sell the Naval Home complex in a public sale.

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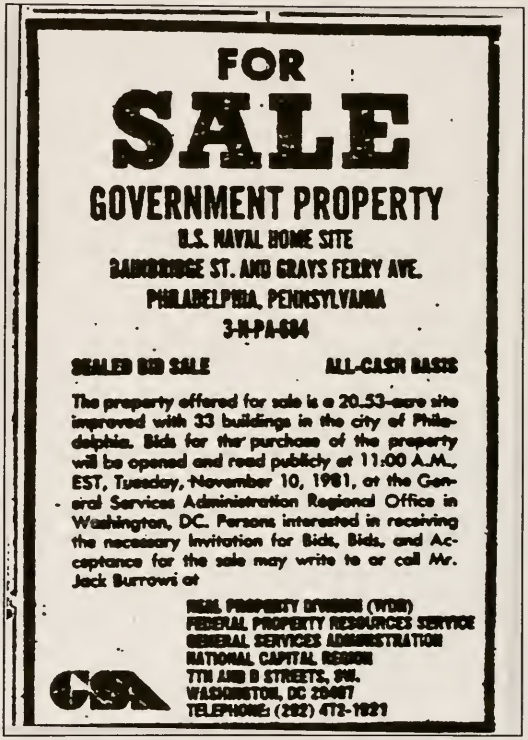
[46] Amendment Number 1 to Disposal Plan, U.S. Naval Home, December 4, 1980, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[47] Ibid.
[48] Ibid.
[49] Disposal Plan, U.S. Naval Home, December 4, 198, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

To advertise the sale, the GSA advertised in several newspapers. **(Figure 24)** In the fall of 1981, the GSA did not receive any bids.



FOR

SALE

GOVERNMENT PROPERTY

U.S. NAVAL HOME SITE

BAINBRIDGE ST. AND GRAYS FERRY AVE.

PHILADELPHIA, PENNSYLVANIA

3-N-PA-694

SEALED BID SALE ALL-CASH BASIS

The property offered for sale is a 20.53-acre site improved with 33 buildings in the city of Philadelphia. Bids for the purchase of the property will be opened and read publicly at 11:00 A.M., EST, Tuesday, November 10, 1981, at the General Services Administration Regional Office in Washington, DC. Persons interested in receiving the necessary Invitation for Bids, Bids, and Acceptance for the sale may write to or call Mr. Jack Burrows at

REAL PROPERTY DIVISION (WDR)
FEDERAL PROPERTY RESOURCES SERVICE
GENERAL SERVICES ADMINISTRATION
NATIONAL CAPITAL REGION
7TH AND D STREETS, SW.
WASHINGTON, DC 20407
TELEPHONE: (202) 472-1021

GSA

Figure 24 Advertisement for the sale of the Naval Home in *The Philadelphia Inquirer*, October 4, 1981.

On October 28, 1981 the Executive Director of the Advisory Council on Historic Preservation (ACHP) ratified and signed a Memorandum of Agreement. **(Appendix A)** This agreement is required for all properties listed on the National Register and it required that the GSA work with the ACHP and SHPO to minimize adverse effects on

the Naval Home site that may be caused by its reuse. The agreement provided for the property to be transferred with preservation covenants that allow the ACHP and SHPO to review development plans. The covenants adopted provided that:

1. Written approval was necessary from the SHPO and ACHP before any alteration, improvement, new development and/or demolition could occur at the Naval Home complex.
2. In the event of a violation of the above covenant, the SHPO or the GSA may bring a lawsuit to stop such a violation or for damages incurred by a such a violation.
3. The covenants would be binding on the Grantee and would run with the property. The ACHP and the SHPO may for a good cause modify or cancel these covenants upon receiving an application from the Grantee.[50] **(Appendix A)**

In March 1982 the GSA put the property out to bid again and there was one successful bidder, Toll Brothers. GSA accepted their bid for $1.2 million and entered into a contract of agreement/option-to-purchase with them on March 18, 1982. Toll Brothers gave a $120,000 deposit, subject to the following conditions:

1. The sale was contingent on Toll Brothers receiving all necessary local, state and federal approvals to develop the Naval Home for no less than 200 dwelling units.
2. Toll Brothers would submit their plan to the SHPO and ACHP after a zoning permit was granted.
3. The SHPO and the ACHP would have thirty days to review the proposed development.
4. Toll Brothers would settle within sixty days of receiving all necessary approvals.[51] **(Appendix A)**

The attachment also stated if the above conditions were not satisfied, Toll Brothers would not be under any obligation to settle the property and all deposit money would need to be returned. From 1982 to 1988 Toll Brothers paid $100,000 a year to retain their option to

[50] Invitation for Bids, United States Naval Home, Philadelphia, PA, GSA Control No. 3-N-PA-684, Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA.

purchase the site. They used this time to work with a myriad of agencies including the SHPO, ACHP, NPS, and the Philadelphia Historical Commission to develop a scheme and gain the necessary approvals to start construction. Toll Brothers did not actually purchase the site until 1988, but by that time six years of negotiations had already occurred and it was evident the reuse of the site was becoming a complex problem.

[51] Toll Brothers Bid for Naval Home, March 10, 1982. GSA Control No: 3-N-PA-684, Contract No. GS-OW-DR-(P) 12218A, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

Chapter 2: Player Participation

Toll Brothers is one among several entites participating over the past twenty years in the redevelopment of the Naval Home. Others are the City of Philadelphia, the Philadelphia Planning Commission, the Philadelphia Historical Commission, the Federal Advisory Council on Historic Preservation, the Pennsylvania Bureau for Historic Preservation, the National Park Service, and the Preservation Alliance for Greater Philadelphia. In addition, the residents of the adjacent neighborhoods also have expressed major interest in the development of the Naval Home. This chapter provides background on these organizations, explains why each is involved, and outlines their interest and concerns for the site.

Toll Brothers

Toll Brothers, Inc. (Toll Brothers) designs, builds, markets and arranges financing for purchasers of single family homes in middle-income and high-income residential communities. Founded in 1967 by Robert Toll and his brother, Bruce, Toll Brothers became a publicly traded company in 1986.[52] In the early 1970's, the company operated in the suburban residential areas of southeastern Pennsylvania and Delaware. Subsequently, Toll Brothers expanded beyond these regions and today operates in twenty-one states: Arizona, California, Colorado, Connecticut, Delaware, Florida, Illinois, Massachusetts, Maryland, Michigan, Nevada, New Hampshire, New Jersey, New York, North Carolina, Ohio, Pennsylvania, Rhode Island, Tennessee, Texas, and Virginia. As reported by journalist Daniel Akst in the April 2001 issue of *Philadelphia Magazine*, Toll Brothers controlled more than 33,000 building lots, mainly located in

attractive suburbs.[53] The company generated $2.2 billion in revenues in 2001, up from $1.8 billion in 2000.[54] At the end of 2001, their detached homes ranged in price from $223,000 to $1,474,000 with an average base sales price of $492,000, excluding customized options. The company's attached homes (also excluding customized options) ranged in price from $165,000 to $605,000 with an average base sales price of $299,000.[55]

The company started by constructing modest homes, but expanded as the Tolls realized there was a market for larger, more elaborate and more expensive homes.[56] Often referred to as McMansions for their generic, placeless architecture, these homes prove to be what many Americans prefer as they continue to purchase them. **(Figure 25)** Akst described Toll Brothers, "If these are McMansions, Toll Brothers is McDonald's, serving up the sort of fast, predictable, attractively priced residential cuisine that an awful lot of buyers seem to hanker for – even if the sight of yet another suburban McMansion going up makes other people want to retch."[57] Not only do these elaborate homes generate a larger profit for Toll Brothers than would more modest homes, but the company reduces its production costs by using tract-home techniques to the construct these high-end homes.[58] By pre-fabricating walls and other parts of a home, Toll Brothers eliminates some of the need they would otherwise have for skilled craftsmen and thereby saves time and money. Building in a factory enables a high degree of

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[52] Daniel Akst, "House of Girth," *Philadelphia Magazine* 92, No. 4 (April 2001): 102.
[53] Akst, 96.
[54] Toll Brothers, Inc., Annual Report (SEC form 10-K), Item 7. Managements Discussion and Analysis of Financial Condition and Results of Operations, January 10, 2002.
[55] Toll Brothers, Inc., Annual Report (SEC form 10-K), Item 1. Business, January 10, 2002.
[56] Akst, 102.
[57] Akst, 96.

customization so that buyers can choose a lot, floor plan, an exterior design, and select details they want incorporated into their home. This can all be done on paper before the house is built and reflects one of Toll Brothers important business strategies: to build houses to confirmed order.[59]

Figure 25 Advertisement for Toll Brothers in *The Philadelphia Inquirer,* Real Estate Section, October 14, 2001.

The company targets its products to "…move-up, empty-nester and age-qualified homebuyers." Akst defined this clientele as "…those with a substantial pile to spend on a house, but do not have a lot of time to spend it."[60] Relocated executives also make up a large part of Toll Brothers' customers.[61] Often known as "relos" these busy executives

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[58] Akst, 102.
[59] Akst, 96.
[60] Akst, 95.
[61] Akst, 103.

don't have a great deal of time to look for a house, and need one soon, so they opt to buy something familiar: a new house on one-acre of land, with roughly 3,500 square feet of living space, a two-car garage, and located in a good school district. Pursuing this type of business lifted Toll Brother into position as one of America's leading builder of luxury housing. In recognition of their success, Toll Brothers won all three of the industry's highest honors: America's Best Builder (1996), the National Housing Quality Award (1995), and Builder of the Year (1988).[62]

Based on their reputation as expert production builders of new luxury homes, I questioned why a company like Toll Brothers purchased the Naval Home, a site of historical buildings. In an interview Andrew Terhune, special projects manager at Toll Brothers, said that the company does not own any other similar urban sites, but that they are looking for them. Mr. Terhune explained there were several reasons the company bought the site. He indicated that Zvi Barzilay, the current president of Toll Brothers, was on the staff of the Philadelphia Planning Commission when Toll Brothers first showed interest in the site. Terhune said of Barzilay, "He's got a degree in urban planning and a bachelors degree in architecture so this was of interest to him."[63] Terhune also said that in the early 1980's, when Barzilay left the planning commission to join Toll Brothers, Philadelphia was in the midst of remaking itself and companies such as Historic Landmarks for Living were quite successful in rehabilitating older buildings for new uses. Based on the success of Historic Landmarks for Living and also new tax incentives that encouraged developers to rehabilitate older buildings, Toll Brothers'

[62] Toll Brothers, Inc., Annual Report (SEC form 10-K), Item 1. Business, January 10, 2002.
[63] Interview with Andrew Terhune, October 16, 2001.

interest in the Naval Home was encouraged. According to Terhune, therefore, Toll Brothers bought the site because of the combination of Barzilay's interest in urban planning and the potential benefit of working with Historic Landmarks for Living.

When Toll Brothers purchased the site, Terhune maintained, they had no idea it would be difficult to develop. Terhune discussed three elements that hindered developing the Naval Home: the cost of renovating the historic structures, the politics surrounding the site's reuse, and the myriad of approvals needed before the company could move forward. Terhune indicated the largest detriment to developing the site was the cost of renovating the historic structures. He said

> Quite honestly the site, if it weren't for the historic buildings, [it] would probably be developed already. It's ...the historic buildings; while they add character to the site and certainly once they are renovated they will provide a focal point, the cost of renovating them and adapting them to other use is so much in excess of their economic value that they are a detriment to renovating or to use of the site at all.[64]

He continued to explain how difficult it was to get the economics to justify the rehabilitation of the historic buildings and said, "if the numbers don't work, you are not going to...nothing is going to happen. It's all driven by economics." Terhune explained that as a for-profit entity, the company was in business to make money for its stockholders and was not in a position to compromise that main objective. Terhune also pointed to the politics of the situation and complained that with the number of agencies involved, the company was deluged with problems every time they wanted to change anything in their plans. According to Toll Brothers, these politics have been a large hindrance to the site's development and prevented the project from moving forward.

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[64] Interview with Andrew Terhune, October 16, 2001.

The third major hindrance Terhune identified to the site's development is that there are "too many" historical agencies involved in the review process. The covenants placed on the land when Toll Brothers purchased the site require approval from three historical agencies: the Advisory Council on Historic Preservation, the Pennsylvania Historic and Museum Commission, and the Philadelphia Historical Commission. In addition, to receive tax credits, approval is required from a fourth agency, the National Park Service. Terhune pointed out that at times the agencies disagreed and he thought limiting agency involvement to the Philadelphia Historical Commission would have eased negotiations and resulted in a "...clear cut and dry" process. In Terhune's view the three covenants placed on the site were also overly restrictive and if a comparable circumstance were to arise today, these covenants would not be included. Though these three covenants are a detriment to the site's development, Terhune said, Toll Brothers still wants to move forward with the project. He added, "...we are in business to make profit for our shareholders and to the extent we are not doing that we're abusing their trust, really. So, we are trying to turn this into something that can be a profitable venture and provide a good return for our shareholders."[65]

The City of Philadelphia and the Philadelphia Planning Commission

The Philadelphia Planning Commission and the City of Philadelphia were extensively involved in considering the issues as to the reuse of the Naval Home between 1977 and 1983. Since 1983, the Planning Commission has had a limited role, restricted to review to decide if the plans presented by Toll Brothers comply with the zoning in

[65] Interview with Andrew Terhune, October 16, 2001.

place. An interview with David Knapton, a planner on the staff of the Philadelphia Planning Commission highlighted the role of his agency.

Knapton explained that in the late 1970s and early 1980s, there was a particular political and social context surrounding the reuse of the Naval Home to which the City had to respond. The residents of the neighborhood directly adjacent to and most affected by the Naval Home had a communal vision. They wanted access to the front lawn and either a nursing facility to care for the neighborhood's aging population or housing for the elderly. The site had been only visually accessible to the community for the past hundred years and according to Knapton the residents "felt it was owed to them."[66] In 1977, the neighborhood community formed the Concerned Community Residents in the Naval Home Area, an interest group to express their ideas and concerns. In a 1983 article in *The Philadelphia Inquirer*, Hank Klibanoff described the residents' concerns:

> There is a feeling among many of the residents of the area represented by CCR that neither Toll nor city Planning Director Craig Schelter paid proper respect to the history of the neighborhood and to the nostalgia that many of the residents still attach to their turf.
> ...The people who live there have always called their neighborhood South Philadelphia; the urban planners and developers now call it Southwest Center City, a seemingly innocuous linguistic device that has the effect of throwing the net of gentrification over the area.[67]

Klibanoff described the adjacent neighborhood as primarily black, with a rich history important to older black Philadelphians. During the first half of the twentieth century, this neighborhood, the 30th Ward, primarily census tract thirteen today, "attracted

[66] Interview with David Knapton, October 12, 2001.
[67] Hank Klibanoff, "Development, with redevelopment," *The Philadelphia Inquirer*, January 21, 1983, 2-B.

ambitious men and women who organized newspapers, fraternal organizations, the Christian Street YMCA, mortuaries and the Citizens and Southern Bank and Trust. "[68]

The City was in a difficult position because they had to evaluate the site's economic value and accommodate the wishes of the neighborhood at the same time. Thomas Hine, architecture critic of *The Philadelphia Inquirer* wrote of then City Managing Director, Wilson Goode's problem,

> His dilemma does not concern the sorts of things the architects or planners will tell him. It is a very sticky matter of local neighborhood politics. Housing for the affluent makes economic sense, but that is likely to frighten working class blacks and whites who live nearby. The suggestion of using the complex to offer social services or recreation would pit the two groups against one another, and low- or moderate-income housing would likely provoke a confrontation."[69]

While the City acknowledged the economic value of the Naval Home site, politicians and city officials could not turn their back on their constituents. From 1978 to 1981 the City negotiated with GSA to purchase the Naval Home, however, the City's $700,000 bid in 1981 was not acceptable to the GSA.[70] Knapton indicated that the City could not afford to offer a price sufficient to satisfy the GSA; it also could not risk alienating the neighborhood. While in the early 1980s, this economic-political equation governed the way city politicians responded, over the next twenty years perceptions changed. Instead of believing the site was owed to them, residents increasingly became concerned with the poor condition of the Naval Home and worried it was becoming an eyesore in their

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[68] Klibanoff, 2-B.
[69] Thomas Hine, "The Naval Home: A National Treasure that Needs Help," *The Philadelphia Inquirer*, August 3, 1980.
[70] Amendment Number 1 to Disposal Plan Dated December 4, 1980, Naval Home File, PA Historical and Museum Commission. Bureau for Historic Preservation, Harrisburg, PA.

neighborhood.[71] In 1996 Ralph Cipriano, journalist from *The Philadelphia Inquirer*, wrote of the Naval Home, "...the place looks pretty beat, with overgrown trees and graffiti-covered walls. And residents and preservationists are wondering if they can trust a firm that they say has done a lousy job of maintaining the historic property."[72] In 1996 Toll Brothers announced its plans to demolish the Governor's and Surgeon General's Residences and the residents and preservation community raised objections. Milton Marks, then vice president of the Preservation Alliance for Greater Philadelphia, described this action as "demolition by neglect." Marks noted that Toll Brothers had a responsibility to maintain the historic buildings and the grounds.[73] By the time these complaints began to surface, there was little the Planning Commission was able to do to influence Toll Brothers. The City had its opportunity in 1981 to purchase the site and guide its development, but fifteen years later the role of the City was limited, and the Planning Commission participation was confined to reviewing the Toll Brothers' plans to ensure their compliance with the zoning code.

Historical Agencies

As already mentioned in this chapter, there were three historic agencies directly involved with the redevelopment of the Naval Home: the Philadelphia Historical Commission (PHC), the Pennsylvania Historical and Museum Commission (PHMC), and the Federal Advisory Council on Historic Preservation (ACHP). The National Park Service and Preservation Alliance were also actively involved participants over the last

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[71] Ralph Cipriano, " Naval Home's neighbors say the site is going to seed, " *The Philadelphia Inquirer*, June 10, 1996, B1.
[72] Cipriano, B1.
[73] Ibid., B5.

twenty years. The roles of these agencies are connected in that they all involve the enforcement of historic preservation rules and regulations that exist at federal, state, and local levels. This section will discuss each agency, and its respective responsibilities and concerns for the site.

Federal Advisory Council on Historic Preservation

The National Historic Preservation Act (NHPA) of 1966, as amended, established the Federal Advisory Council on Historic Preservation (ACHP) in Title II. Section 201.[74] The ACHP is an independent agency of the United States Government. Section 202 of the NHPA defines the duties of the Council. These duties include advising the President and Congress on historic preservation issues, encouraging public interest and participation in historic preservation, recommending studies of existing preservation legislation and tax policies to asses their success, advising State and local historic preservation agencies about preservation legislation, encouraging training and education in the field of historic preservation, and recommending improvements for the effectiveness and consistency of the policies and programs of the NHPA.[75]

Over the past twenty years several individuals from the Advisory Council have been involved with the Naval Home project, including Gary Hume and Charlene Dwin Vaughn. I spoke with Ms. Vaughn to ascertain the Advisory Council's role and perspective on the site. Vaughn stated that the responsibility of her office was to conduct a Section 106 Review as required and defined by the National Historic Preservation Act of 1966. The NHPA established the National Register of Historic Places, the National

[74] Title 2, Section 201 of the National Historic Preservation Act, 16 U.S.C. 470i.
[75] Title 2, Section 202 of the National Historic Preservation Act, 16 U.S.C. 470j.

Historic Landmarks program, the nomination processes, criteria for designation, the appointment of the State Historic Preservation Officer (SHPO), and SHPO responsibilities. Section 106 of the NHPA created a requirement that,

> ...the head of any Federal Agency having direct or indirect jurisdiction over a proposed Federal or federally assisted undertaking in any State and the head of any Federal department or independent agency having authority to license any undertaking shall, prior to the approval of the expenditure of any Federal funds on the undertaking or prior to the approval of the expenditure of any Federal funds on the undertaking or prior to the issuance of any license, as the case may be, take into account the effect of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register.[76]

Under this regulation Section 106 applied to the Naval Home because a federal agency, the GSA, was taking action to transfer federal property out of federal ownership and that could potentially have an adverse effect the historic property. In addition to Section 106, Section 110 applied to the Naval Home. Section 110 states that the heads of all federal agencies are responsible for the preservation and use of historic buildings.[77] Section 110f established,

> Prior to the approval of any Federal undertaking which may directly and adversely affect any National Historic Landmark, the head of the responsible Federal agency shall, to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to such landmark, and shall afford the Advisory Council on Historic Preservation a reasonable opportunity to comment on the undertaking.[78]

Working under Section 106 and Section 110, Vaughn explained that the responsibility of the Advisory Council was to work with the SHPO to ensure that the development plan proposed by Toll Brothers did not adversely affect the historic integrity of the Naval Home. Vaughn also stated that the SHPO was integral to the process and

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[76] Section 106 of the National Historic Preservation Act, 16 U.S.C. 470f.
[77] Section 110 of the National Historic Preservation Act, 16 U.S.C. 470h-2.

the Advisory Council, in order to minimize the number of historical agencies involved, deferred to the SHPO's recommendation several times throughout the review and approval process.[79] In Vaughn's opinion, the Naval Home illustrates a case in which the strengths of planning and preservation did not work together. She commented that the three covenants may not have been adequate in that they were too broad. She conjectured that perhaps timelines and performance reports should have been required to ensure Toll Brothers or any other buyer would periodically report on their progress and the site's condition. Vaughn added that recently there has been speculation that Toll Brothers wants to sell the site, and she questioned whether there should have been another requirement added to the covenants to stipulate that Toll Brothers had to work with a partner. Finally, Vaughn added that a city like Philadelphia, known for its historic properties, could have done more for one of its National Historic Landmarks.[80]

Pennsylvania Historical and Museum Commission - Bureau for Historic Preservation

Upon the ratification of Act 446 on June 6, 1945, an amendment to the Pennsylvania Administrative Code, three agencies, the Pennsylvania Historical Commission, the State Museum, and the State Archives merged to form the Pennsylvania Historical and Museum Commission (PHMC). The PHMC is the official agency of the Commonwealth responsible for the conservation of the state's historical heritage. The Bureau for Historic Preservation is part of the PHMC and serves as the State Historic Preservation Office (SHPO). The Executive Director of the PHMC, Brent Glass, Ph.D.,

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[78] Section 110f of the National Historic Preservation Act, 16 U.S.C. 470h-2.
[79] Phone conversation with Charlene Dwin Vaughn, January 31, 2002.

is the State Historic Preservation Officer. The SHPO administers the state's historic preservation program as authorized by the Pennsylvania History Code and the National Historic Preservation Act of 1966. Advisory boards and the *Pennsylvania Historic Preservation Plan* guide the SHPO. The Governor of Pennsylvania also appoints a board of Commissioners to oversee the SHPO. The function of the SHPO is to identify and protect the architectural and archaeological resources of Pennsylvania. In order to provide adequate services the SHPO is divided into three units, Preservation Services, Archaeology and Protection, and Grants Programs and Planning. All three of these had a role in the Naval Home project.[81]

The SHPO's involvement over the past twenty years has centered around the following issues: approval of Toll Brothers' site plan, concern for the condition and deterioration of the buildings, and Toll Brothers' application for the Federal Rehabilitation Investment Tax Credit. Various staff members of the SHPO have been involved in the Naval Home project. Brenda Barrett was the Director of the Bureau from 1980 to 2000 and played a key role in this time period. Dan Deibler is the current Chief of the Bureau and has been involved with the project since 1982. Bonnie Wilkinson Mark, joined the staff in 1997 as an historical architect and she reviewed the most recent proposal submitted in 1999 with modifications in 2000. I had an opportunity to speak with Ms. Wilkinson Mark and Mr. Deibler about their experience with the project. Deibler expressed the SHPO's general concerns and also recognized Toll Brothers' point of view. Deibler said the SHPO's view is that the front lawn and the relationship

[80] Phone Conversation with Charlene Dwin-Vaughn, January 31, 2002.

between the three Strickland buildings defines the character of the site, and it is vital that this composition remain as Strickland intended. However, he pointed out that Toll Brothers does not recognize the significance of the front lawn and views it as open space. Toll Brothers did respect the front lawn and in their 1985 and 1997 proposals. However, in 1999, Toll Brothers submitted a plan that showed new construction on the front lawn and between the historical buildings. **(Figure 41 in Chapter 3)** Deibler explained the SHPO would like to see more open space between the Strickland buildings and the new housing planned for the site. In an effort to guide the preservation of the three structures, the SHPO steered Toll Brothers towards the tax credit application process. To receive tax credits Toll Brothers had to meet the Secretary of the Interior's *Standards for Rehabilitation* and the SHPO believed this requirement would result in a strong preservation plan.[82] However, these Standards are broad, open to interpretation, and did not clarify, in Toll Brothers' opinion, the manner in which the SHPO wanted the historical buildings treated.[83] The tax credit application process will be discussed later in conjunction with the National Park Service's responsibilities. In addition, Deibler pointed out that the SHPO was not concerned with development cost as Toll Brothers was and this resulted in different points of view. The SHPO acknowledged that Toll Brothers is driven by the housing market and the cost associated with holding and developing the site. Ms. Wilkinson Mark added that Toll Brothers is also driven by the visibility their project will have and therefore prefers to place new housing towards the

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[81] Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[82] Conversation with Dan Deibler, February 5, 2002.
[83] Interview with Andrew Terhune, October 16, 2001.

front of the property rather than in the back. In addition, both Deibler and Wilkinson Mark mentioned that Toll Brothers is comfortable with wood frame construction and did not want to build new housing that would require steel construction. Therefore, the heights of the new buildings suggested in their proposals do not go above three stories, as four stories would require steel construction. Deibler and Wilkinson Mark indicated the SHPO would not object to buildings at or above four stories at the back of the property. The last main concern the SHPO expressed over Toll Brothers proposals is the increasing density they want to place on the site. In 1982 Toll Brothers stipulated they needed to place two-hundred dwelling units on the site and by 1994 this number increased to one-thousand two-hundred.[84]

When Toll Brothers entered into the option to purchase agreement in 1982, the GSA placed three covenants (discussed in Chapter 1) on the property. The first covenant required the approval of the SHPO and the Advisory Council (discussed below) before "any alteration, improvements, new development and/or development" took place at the Naval Home complex. Thus, the SHPO's involvement with Toll Brothers began in 1982 and they participated in the meetings and correspondence between the company and the Philadelphia Historical Commission, Advisory Council on Historic Preservation , and the National Park Service.[85]

One of the main responsibilities of the SHPO was to work with the Advisory Council on the Section 106 Review (discussed below) for the Naval Home. Section 106

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[84] Earni Young, "Navy Home rehab," *The Philadelphia Daily News*, January 27, 1994, 25.
[85] Brenda Barrett to Zvi Barzilay, June 8, 1982. Carl K. Zucker to Allan Wakner, Brenda Barrett, and William Brookover, and Polly Matherly, July 16, 1982, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

of the National Historic Preservation Act of 1966 requires the Advisory Council to review the effect of a particular project on "...any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register."[86] Throughout the early 1980s the SHPO reviewed and made comments on the architectural plans Toll Brothers suggested for the site.[87] As time passed and no plan was implemented, the SHPO exercised another function. The SHPO was concerned with the site's condition, deterioration, and maintenance. In 1997 Brent Glass wrote to Zvi Barzilay to remind him that "The historic buildings have been vacant for over fifteen years and are suffering from the effects of wind, water, and weather."[88] Douglas Gamble, project manager at Toll Brothers, responded that the company spent over $500,000 on maintenance.[89] Along with these responsibilities, the SHPO was also involved, along with the National Park Service, in the review of Toll Brothers' tax credit application.

National Park Service

In addition to the SHPO, the Historic Preservation Services Division, National Park Services (NPS) played a critical role in protecting and preserving the Naval Home complex. The Division offers a broad range of services including financial assistance and incentives, educational guidance, and technical information on the rehabilitation of historic buildings. The NPS works in conjunction with State Historic Preservation Offices, local governments, federal agencies, colleges, and non-profit organizations to

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[86] Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470f)
[87] See letters dated August 3, 1983, October 7, 1983, and December 30, 1983in Appendix B.
[88] Brent Glass to Zvi Barzilay, July 3, 1997, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[89] Douglas Gamble to Don Klima, July 7, 1987, Naval Home File, PA Bureau of Historic Preservation, Harrisburg, PA.

manage all the programs it offers. One program the NPS jointly manages with the Internal Revenue Service and State Historic Preservation Offices is the Federal Historic Preservation Tax Incentives program.

Included in the Preservation Tax Incentive program is a 20% tax credit for rehabilitating historic buildings. However, these buildings must meet certain criteria established by the Secretary of the Interior: the buildings must be listed on the National Register; the buildings must be used for income producing purposes, the work has to be done according to the Secretary of the Interior's *Standards for Rehabilitation;* the project has to meet the "substantial rehabilitation test" (amount of money spent on the rehabilitation is greater than the adjusted basis of the building or greater than $5,000; work must be completed within twenty-four months); and after rehabilitation, the building must be owned by the same owner and operated as an income producing property for five years.[90] The Naval Home met all of these criteria except for one that caused major setbacks to the project. The SHPO and the National Park Service consistently found that the work suggested by Toll Brothers did not meet the Secretary of the Interior's *Standards for Rehabilitation.* The exact nature of the problems will be discussed in Chapter 3. Throughout the application process, the SHPO provided technical assistance to Toll Brothers and made suggestions so that before the tax application was sent to the NPS, Toll Brothers had the opportunity to incorporate the SHPO's recommendations. Once the SHPO reviewed Toll Brothers application, it submitted the application with a recommendation to the National Park Service for another

review, comment, and final decision. The application consists of three parts. Part 1 certifies the building is an historic structure and is eligible for the tax credit. Buildings that are individually listed such as the Naval Home are automatically designated as certified historic structures. Part 2 is a description of the scope of work to be done and should be filed before the work begins. Part 3 is a request for Certification of Completed Work which documents the work and acts as proof for the Internal Revenue Service that the rehabilitation is "certified."

It is important to discuss the history of Federal Historic Preservation Tax Incentives to understand how they have affected the Naval Home project. In 1976, Congress passed the Tax Reform Act of 1976 and a year later the NPS established an administrative program. This act was the first major preservation tax incentive for the rehabilitation of income-producing certified historic properties. In addition, the act encouraged preservation rather than new development. Five years later, the Economic Recovery Tax Act of 1981 made changes in federal tax laws. As Charles E. Fisher wrote of the 1981 legislation, "This legislation acknowledged the dramatic impact of federal assistance through the tax laws on historic properties and marked the most significant effort to foster historic preservation through national tax policies."[91] In addition to the Economic Recovery Tax Act of 1981, the Tax Reform Act of 1986 brought significant changes to preservation tax policies. This Act lowered the preservation credit from 25%

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[90] "IRS Requirements," *Federal Historic Preservation Tax Incentives Brochure*, National Park Service, available from http://www2.cr.nps.gov/tps/tax/brochure2.htm#intro; Internet; accessed 17 March 2002.
[91] Charles E. Fisher, "Historic Preservation Tax Incentives Program, The First 20 Years," *Cultural Resource Management* 20, No. 6, (1997): 5.

to 20%, which led to a reduced use of the preservation tax incentives from 1987 to 1993.[92] **(Figure 26)**

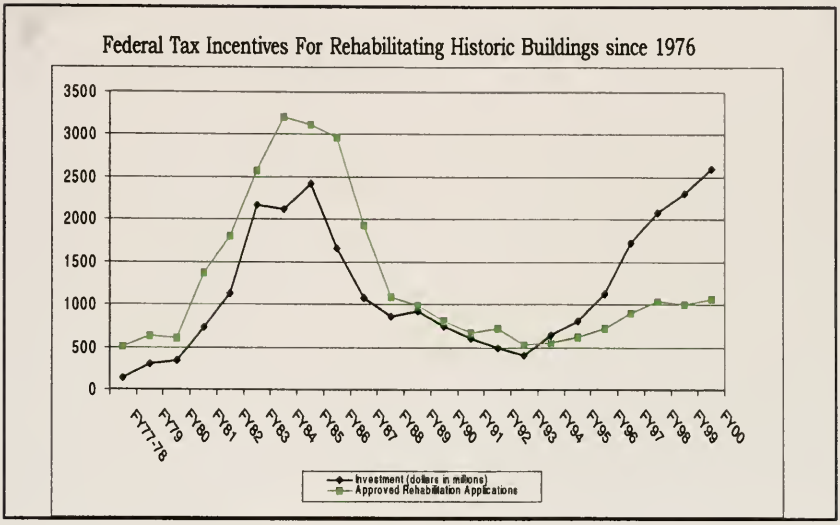

Figure 26 Chart compares the number of approved applications (green line) to the investment dollars in millions (black line).

From this chart we see that when Toll Brothers first became involved with the Naval Home in 1981, there was an upswing in the use of tax incentives that lasted until 1987, at which time the use of tax incentives dropped due to the changes brought about by the Tax Reform Act of 1986. However, with an improved economy in the mid 1990s, there was an increase in the number of projects using the tax incentives.[93] Toll Brothers applied for tax credits twice, with two different proposals. The first application was in 1985 and was governed by the Economic Recovery Act of 1981. The second application was in 2000

[92] Ibid.
[93] Ibid.

and fell under the jurisdiction of the Tax Reform Act of 1986.[94] The change in tax law was one factor among many others that Toll Brothers claims contributed to the delay of their project.[95]

Philadelphia Historical Commission

In 1955 Mayor Joseph S. Clark and City Council passed an ordinance that created the Philadelphia Historical Commission (PHC or Commission), which granted the PHC the power to designate historic buildings, review building permit applications for such properties, and delay demolitions for a period no longer than six months.[96] The 1955 ordinance was rewritten and on April 1, 1985 a new ordinance went into effect.[97] The new ordinance empowered the Commission to designate historic buildings, sites, structures, objects, and districts of historical or architectural significance in Philadelphia. It also established a review process that required the Commission's approval on any work that will require a building permit or change the appearance of an historic building. By this ordinance the Department of Licenses and Inspection cannot issue a building permit for an historic site without that approval from the Commission. Along with these powers the PHC provides technical assistance on the preservation and conservation of historic properties, maintains a library on Philadelphia history, architectural history, and

[94] Toll Brothers, "Historic Preservation Certification Application Part 2 - Description of Rehabilitation, July 1985, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[95] Interview with Andrew Terhune, October 16, 2001.
[96] Richard Tyler to Patricia E. Bailey, September 10, 1987, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[97] Ibid.

preservation, and performs reviews under Section 106 in lieu of the State Historic Preservation Office and Advisory Council.[98]

In the case of the Naval Home, the PHC was deeply involved with the building permit review process. In September 1987 Richard Tyler outlined in a letter to Patricia E. Bailey the role the PHC played in the process surrounding the reuse of the Naval Home from 1982 to 1987. This letter was written in response to a July 1987 letter addressed to Don L. Klima, Chief, Eastern Division of Project Review of the Advisory Council from Douglass R. Gamble, project manager with Toll Brothers. Gamble's letter accused the PHC of delaying Toll Brothers acquisition and development of the Naval Home.[99] Tyler's letter explained that by July 1982, the PHC along with the SHPO, and the NPS held several meetings and exchanged numerous letters with Toll Brothers "...in an effort to resolve diverse issues such as the treatment of the front lawn, the siting and materials of the new construction, the overall site plan and the demolition of Laning Hall."[100] Meetings and correspondence continued from 1982 to 1985 in an attempt to resolve these issues. The PHC had no role in the review of Toll Brothers application for federal tax incentives or compliance with Section 106 of the National Historic Preservation Act of 1966. However, Tyler did participate in the meetings between Toll Brothers, the SHPO and the Advisory Council. Tyler wrote in those meetings he objected "...to several elements, including the materials and siting of the new

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[98] Section § 14-2007 of the Philadelphia Code.
[99] Douglass R. Gamble to Don L. Klima, July 7, 1987, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[100] Richard Tyler to Patricia E. Bailey, September 10, 1987, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

construction, particularly in relationship to the three Strickland buildings; the overall site plan which...failed to reflect the urban context of the Naval Home, and the intrusion of parking on the front lawn."[101] These objections were similar to the concerns expressed by the SHPO and the NPS and they became the central focus of the debates that would ensue over the next decade with Toll Brothers. These debates will be further developed and discussed in chapter 3. From 1982 –1987 the PHC articulated a consistent concern for the front lawn, site plan, and design of new construction.

Preservation Alliance for Greater Philadelphia

Founded in 1996, the Preservation Alliance for Greater Philadelphia grew from a merger of two previous historic preservation organizations, the Preservation Coalition of Greater Philadelphia and the Philadelphia Historic Preservation Corporation. The Preservation Alliance, a nonprofit membership organization, promotes the protection and preservation in the Philadelphia region of historic buildings, communities, and landscapes. The Alliance supplies the following services: providing an educational resource on historic preservation issues both locally and nationally; administering an easement program, protecting historic resources that are in danger; and, in the past, buying historic property and remarketing it to developers for adaptive reuse. Occasionally, the Preservation Alliance becomes involved in a particular site such as the Naval Home to help ensure that any new development is carried out in a manner that

[101] Richard Tyler to Patricia E. Bailey, September 10, 1987, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

respects the historic buildings. In this case, the PHC, the SHPO, and the NPS asked the Alliance to undertake a new study of the Naval Home in 1996.[102]

In October 1996 the Preservation Alliance submitted an application to Preservation Pennsylvania, a private non-profit organization, to secure funding from the Philadelphia Intervention Fund to conduct a development analysis of the Naval Home. In November 1996, the Preservation Pennsylvania awarded the Alliance $20,000 to be used for the Naval Home Study.[103] There was no legal agreement between the Alliance and Toll Brothers; however, Randall Cotton, Associate Director of the Preservation Alliance, described an informal agreement between the two parties.[104] Though Toll Brothers was under no obligation to adopt the Alliance's recommendations, they did participate in the process and in the end incorporated some of the Alliance's suggestions.[105] The intent of the Preservation Alliance was to "demonstrate how to preserve the most historically significant precinct of the site and to determine how the owner could realize a viable return on investment within the restrictions of a preservation solution."[106] Led by their President at the time, Don Meginley, the Alliance worked with a real estate consultant, Stanley Taraila of Renaissance Properties and an architectural firm, Voith & Mactavish, to design a development plan that would be agreeable to both Toll Brothers and the various historic agencies involved. The specific details of this plan and its

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[102] Milton Marks to Caroline Boyce, October 16, 1996, Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA.
[103] Caroline Boyce to Milton Marks and J. Randall Cotton, November 6, 1996, Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA.
[104] Conversation with Randall Cotton, Associate Director, Preservation Alliance, January 15, 2002.
[105] Andrew Terhune to Herbert Vederman, Wayne Spilove, and Richard Snowden, July 9, 1997, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

recommendations will be discussed in Chapter 3. While Toll Brothers did incorporate many of the suggestions made by the Preservation Alliance and presented this revised scheme for approval, in the end they chose not to move forward with it. The reason Toll Brothers chose to forego this plan in favor of working with another architect is unclear, but perhaps the informal agreement between the Alliance and Toll Brothers was not as strong as the Alliance perceived it to be. Andrew Terhune from Toll Brothers believed that the Preservation Alliance was not helpful as it was another interest group seeking to become involved and felt that with three agencies overseeing the project there was no need for yet another historic preservation organization's opinion. Though the efforts of the Preservation Alliance were ultimately unsuccessful, they reflect the struggle the Advisory Council for Historic Preservation, the Pennsylvania Bureau for Historic Preservation, the National Park Service, and the Philadelphia Historical Commission, faced in shaping the redevelopment plan for the Naval Home.

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[106] Preservation Alliance for Greater Philadelphia, *Philadelphia Intervention Fund Grant Application*, October 16, 1996, Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA.

Chapter 3: Toll Brothers' Proposals

The focus of this chapter is the proposals put forward by Toll Brothers from 1982 to 2000. In the files at the Pennsylvania Bureau of Historic Preservation, there were two tax credit applications submitted over the past twenty years. Toll Brothers submitted the first application in 1984 and revised it in July 1985. An application based on a different design proposal was presented in April 2000. Though there were only two formal tax credit applications, Toll Brothers advanced several design proposals between 1982 and 2000. In addition, over these eighteen years there were multiple meetings and a wealth of correspondence between Toll Brothers, the involved historic agencies, the GSA, and the City of Philadelphia. In order to describe these events, I divided the time period from 1982 to 2000 into three sections: 1982 to 1987, 1988 to 1993, and 1994 to 2000, corresponding to related event developments.

I. 1982 to 1987: Toll Brothers' First Attempt to Gain Approval

The General Services Administration accepted Toll Brothers' bid for the Naval Home on March 18, 1982.[107] In June 1982, Brenda Barrett, Director for the Bureau for Historic Preservation (SHPO) wrote to Zvi Barzilay, then a project manager with Toll Brothers. Barrett outlined the historic preservation requirements that Toll Brothers needed to address in planning its redevelopment of the Naval Home. Two requirements were approval from the Philadelphia Historical Commission (PHC) before any demolition or alteration could take place and approval from the Advisory Council on Historic Preservation (ACHP) and the Pennsylvania Historical and Museum Commission,

Bureau for Historic Preservation (SHPO). The final condition was that in order receive the 25% tax credit approval from the National Park Service (NPS) was necessary.[108] At the end of July, Barrett stated that the SHPO approved Toll Brothers proposal in concept.[109] Toll Brothers' plan at that time called for the rehabilitation of Biddle Hall into sixty-five apartments, rehabilitation of the two residences for commercial use, and preservation of the site's landscaping, fence and gatehouses. The plan called for three hundred twenty-five new dwelling units or apartments. **(Figure 27)** Barnett commented on this plan:

> In concept we support approval of the proposed plan that will retain and rehabilitate the National Historic Properties - Biddle Hall, the Governor's Residence, and the Surgeon General's residence and keep the front lawn, the existing walls with associated guard houses and many of the groupings of specimen trees. We recognize that the proposed plan would require the demolition of other properties on the National Register site specifically Laning Hall. However, it is our opinion based on the prior reuse study developed in part with a grant from our office that the present approach is the only way to preserve the landmark buildings and get the development of the site off dead center where it has been sitting for the past five years.[110]

Barrett was referring to the study conducted by Wallace Roberts and Todd (WRT) for the City of Philadelphia in 1980. In addition, Barrett noted that demolition of Laning Hall was a trade off for the preservation of the front lawn and the Strickland buildings. The

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[107] Toll Brothers Bid for Naval Home, March 10, 1982, GSA Control No: 3-N-PA-684, Contract No. GS-OW-DR-(P) 12218A, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

[108] Brenda Barrett to Zvi Barzilay, June 8, 1982, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

[109] Brenda Barrett to Zvi Barzilay, July 27, 1982, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

[110] Brenda Barrett to Myra Harrison, July 21, 1982, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

demolition of Laning Hall created a controversy from 1988 to 1991 and will be discussed below in section two of this chapter. By the end of July 1982 Toll Brothers also received conceptual approval for this proposal from the ACHP.[111]

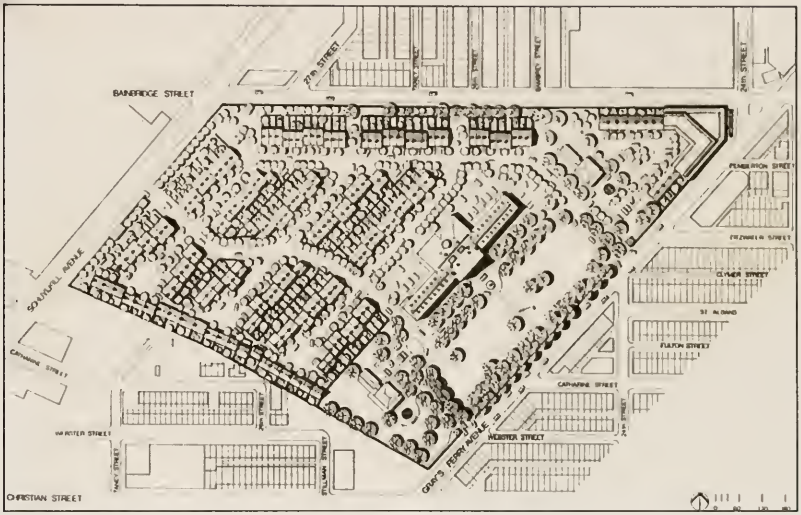

Figure 27 First conceptual design proposed by Toll Brothers in 1982. Design by Wallace Roberts Todd.

In August 1982 Myra Harrison, Assistant Regional Director of the Mid-Atlantic Regional Office of the NPS wrote a memo to the Chief of the Resource Assistance Division and requested that the Washington, D.C. office assume responsibility for the review of the Naval Home Tax Act project. Harrison stated "...that the proposed rehabilitation/redevelopment project will raise major questions of policy and

[111] Jordan E. Tannenbaum to Zvi Barzilay, July 30, 1982, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

precedent."[112] Therefore, the Washington, D.C. office of the NPS took over the review process when it was in its early stages. In November 1982 Lee Nelson, Chief of the Preservation Assistance Division of the NPS, wrote Barzilay and summarized the agreements reached during a meeting on November 1, 1982, in Philadelphia. In that meeting, Toll sought preliminary approval from the NPS of their redevelopment plan. Before this approval could be granted, however, Nelson explained that Toll Brothers had to meet certain requirements. First, because the WRT plan called for the demolition of Laning Hall, Nelson stated he needed "convincing information supporting the infeasibility of reusing Laning Hall" before he could approve its demolition as part of the overall project.[113] He requested Barzilay send him a letter with such information. Nelson also stated that he and Barzilay agreed that a mutually endorsed preservation checklist would be prepared for the Strickland Buildings and the front lawn. This list was to be prepared on November 10, 1982, during a site visit to the Naval Home. Nelson concluded that his approval of the preliminary plan was also contingent on modifications in the location of new residential units.[114]

On November 24, 1982, Zvi Barzilay provided Nelson a letter from Richard Huffman, a partner at WRT that justified the demolition of Laning Hall. Huffman indicated that Laning was difficult to reuse for a residential purpose because the structure was only twenty-six feet wide. According to Huffman, it would have been very difficult

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[112] Myra Harrison to Chief, Reource Assistance Division, August 11, 1982, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[113] Lee Nelson to Zvi Barzilay, November 9, 1982, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[114] Lee Nelson to Zvi Barzilay, November 9, 1982, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

to design an efficient double loaded corridor; and while a single loaded corridor was possible, Huffman pointed to the problems that would be associated with that type of design. He wrote:

> A single loaded scheme could produce 15 units per floor, however, the large proportion of circulation space makes the cost per unit very high. ... Renovation of Laning Hall for residential purposes will be a significantly higher cost than new construction. Because of the inefficiency of layout, Laning Hall will cost nearly twice as much per unit as new construction. Coupled with the high operating costs and limited residential rental market it is not economically feasible to develop Laning Hall for residential rental even with maximum tax incentives.[115]

On November 24, 1982, Lee Nelson wrote Barzilay and detailed the preservation checklist with which Toll Brothers had to comply in any reuse scheme. **(Appendix B)** The issues of concern surrounding Biddle Hall included the roof, the verandas, the façade masonry and ornamental details, the domed assembly hall, other interior features, and the Biddle Hall annex. Nelson stated the most important condition Toll Brothers had to satisfy in any proposal was:

> ...the placement (on your site plan) of the new housing units between Biddle Hall and the Governor's Residence. Alternatives to this placement shall be considered so that the units are placed well behind the front plane of Biddle Hall (not forward of the center line axis of Biddle Hall, as is proposed for the new units between Biddle Hall and the Surgeon General's Residence).[116]

Nelson's last condition outlined the criteria that the all the historic agencies abided by and agreed upon: new construction was to be set back from the Strickland buildings and the front lawn was to be left untouched. In 1997, upon reviewing Toll Brothers' second

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[115] Richard Huffman to Zvi Barzilay, November 18, 1982, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

major proposal, the SHPO cited this letter as their justification for not granting approval. (See discussion below.) In the same letter, Nelson also stated that he was prepared to approve the overall development scheme if Barzilay endorsed and committed to the checklist and submitted documentation that justified the demolition of Laning Hall.[117] Nelson also indicated that he expected to further consult with Toll Brothers when they had more detailed plans to submit. In addition, Nelson expected to receive a Part 2 application of an Historic Preservation Certification Application for review by the SHPO before the application was sent to the NPS.

At the end of November 1982 Barzilay sent a letter to Dr. Larry E. Tise, then Executive Director of the Pennsylvania Historical and Museum Commission. Barzilay requested a written response from Tise that certified the State's approval so that Toll Brothers could move forward.[118] Tise responded on December 20, 1982, "The plan in concept proposes the redevelopment of the rear of the site with compatible new construction and the preservation and rehabilitation of the landmark Strickland buildings."[119] Tise stated that the Commission conceptually supported that approach. Tise indicated that the Commission and the Advisory Council would formally review the plans when Toll Brothers submitted more detailed plans for new construction and the specifications for the rehabilitation of the historic structures.

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[116] Lee Nelson to Zvi Barzilay, November 24, 1982, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[117] Ibid.
[118] Zvi Barzilay to Larry Tise, November 29, 1982, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[119] Larry Tise to Zvi Barzilay, December 10, 1982, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

In January 1983 the SHPO granted conditional approval of the work on Biddle Hall, the Governor's Residence and Surgeon General's Residence and the North and South Gatehouses and Front Fence providing the work met the Secretary of the Interior's *Standards for Rehabilitation*. In addition, the SHPO desired new construction be set back from the historical buildings. As long as the rehabilitation work concurred with the Secretary of the Interior's *Standards* and the new construction was placed away from the historic structures, the SHPO stated it would be able to recommend certification of the project for federal tax incentives.[120] Though this approval came from the SHPO, the NPS was not yet able to grant approval for the tax credits.

In mid February 1983 Nelson, on behalf of the NPS, notified Barzilay that the letter written by Huffman did not "...on its own, adequately document the economic infeasibility of developing Laning Hall."[121] However, Nelson stated that his own inspection and the WRT reuse study published in 1980 convinced him of the infeasibility of developing Laning Hall. He continued the demolition of Laning did not:

> ...preclude ultimate certification of the project, provided that the conditions of my letter of November 24, 1982 are met, and that the historic character of Biddle Hall, the flanking buildings, the frontal setting, gatehouses, and front wall/fencing are preserved. These preservation aspects are essential to sustain the landmark status for this property, and to receive the tax benefits.[122] (emphasis in original)

On February 16, 1983, Barzilay applied for a demolition permit for Laning Hall.[124] In March 1983 the PHC, pursuant to the preservation ordinance of 1955,

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[120] Brenda Barrett to Zvi Barzilay, January 23, 1983, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[121] Lee Nelson to Zvi Barzilay, February 16, 1983, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[122] Ibid.
[124] City of Philadelphia, Demolition Permit #82056. March 18, 1983. Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA.

approved the demolition of Laning Hall with the understanding that the front lawn would be maintained. Tyler wrote that this decision resulted from both the consensus reached between the historical agencies and Toll Brothers as well as the limited power provided to the Commission to block demolitions under the 1955 ordinance. Toll Brothers could have demolished Laning Hall anytime after March 1983, but they did not because they did not have the necessary approvals for the tax credits in place from the NPS or approval from the Advisory Council and SHPO.[125]

In a letter dated February 25, 1983, to Mr. Barney Maltby of the GSA, Zvi Barzilay requested a six month extension of Toll Brothers' contract to purchase the Naval Home. Toll Brothers was not ready to close the sale because they did not have all the necessary approvals for a building permit to be issued. The GSA granted an extension until September 17, 1983.[126] In May 1983 Nelson, not having received a response to his November 24, 1982, or February 16, 1983, letters, encouraged Toll Brothers to submit a Part 2 Historic Preservation Certification Application.[127]

In July 1983 Nelson received perspective renderings from The Salkin Group, Inc. that illustrated the relationship of the new housing units to the historic buildings. **(Figure 28)** The same drawings were also sent to the SHPO and in early August Brenda Barrett presented Nelson the comments of her office. Barrett said the scale, massing, and design of the new construction was acceptable. However, she expressed concern about the material to be used for the new buildings. Toll Brothers had not specified the material,

[125] See letters from Lee H. Nelson to Zvi Barzilay, November 24, 1982 and February 16, 1983 in Appendix B. Toll Brothers had not yet submitted Part 2 Application.
[126] Lee Nelson to Zvi Barzilay, May 5, 1983, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

but, Barrett wrote, because the color of the historic buildings ranged from light tan and yellow to gray the new construction should follow the same color range. The texture also was important and Barrett commented that the texture should resemble the stone or stucco of the existing buildings.

Figure 28 Salkin Group Perspective Renderings, 1983.

Barrett also mentioned that red brick would not be compatible with the historic structures on the site and therefore would not be compatible. She stated, "The fact that red brick is common in Philadelphia and the surrounding neighborhood is irrelevant."[128] Barrett also commented on the placement of the new buildings and stated that SHPO would like to see the new construction sited further from the historical buildings and

[127] Ibid.

"behind the center line of Biddle Hall."[129] This letter from Barrett influenced Nelson's response to The Salkin Group.

In late August 1983 Nelson wrote to The Salkin Group that while the design of the new units in the historic context pleased him, he had concerns over where the buildings were placed and questioned whether the new units could be relocated to minimize their impact on the historic buildings. Nelson also raised questions about the materials to be used in the new construction. Toll Brothers' plan was to use materials compatible with both the surrounding community and the Naval Home site. Nelson, like the SHPO, did not feel the materials needed to be compatible with the surrounding community and asked Toll Brothers to rethink the choice of material in light of the fact that the historic buildings and gatehouses had painted stucco walls.[130] In response, Toll Brothers began to express its frustration with the approval process. Barzilay wrote,

> As we all realize, the Naval Home is not in the most ideal location, and major compromise would have to be made in order to market this site. ...There are various examples throughout the country where indigenous materials were a major marketing obstacle. I trust that neither you nor us would like to see the market resistance to purchasing units in the Naval Home. Therefore, I hereby request that you withdraw from your recent request, and provide us with the flexibility necessary to make our project a success.[131]

In December of 1983 Toll Brothers submitted Part 2 Historic Certification Applications to the SHPO.[132] Toll Brothers submitted separate applications for each part of the project. Three of these applications were in the Naval Home file of the

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[128] Brenda Barrett to Lee Nelson, August 3, 1983, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[129] Ibid.
[130] Lee Nelson to Thomas C. Barton, III, August 25, 1983, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[131] Zvi Barzilay to Brenda Barrett, September 9, 1983, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

Preservation Alliance. There was one application for site and landscaping issues, one for the gatehouses and fence, and one for the Governor's Residence. The first response to these applications came at the end of December. Barry Loveland and Patrick O'Brannon reviewed the applications for the SHPO and they concluded that the project met the Secretary of the Interior's *Standards*, but with "reservations and concerns." O'Brannon outlined these concerns in his December 30, 1983, letter. O'Brannon requested an existing conditions site plan to complete the review. He also made six comments on the proposed project:

> 1. The south gates could not be mounted as sliders. They had to swing out.
> 2. Alternatives to the proposed widening of the north gate needed to be explored.
> 3. New townhouses to the north of the Governor's Residence needed to be moved west to be recessed from the front plane of the Governor's Residence.
> 4. Parking proposed in the front (east) of Biddle Hall was unacceptable and will not be permitted. This parking needed to be moved elsewhere on the site.
> 5. The existing lampposts on the site needed to be retained, relocated as necessary, and incorporated into the lighting plan for the site. New lighting posts must be compatible in design to existing lampposts.
> 6. The existing pavilions needed to be retained, relocated as necessary, and incorporated in the site plan if feasible.[133]

O'Brannon wrote a similar letter concerning the Governor's Residence in which he listed eleven comments on the proposed rehabilitation.[134] Toll Brothers responded to the SHPO's comments in a letter on February 24, 1984, requesting that the information included in the letter be added to their Part 2 applications.[135] One important section in

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[132] Naval Home File, Preservation Alliance for Greater Philadelphia.
[133] Patrick O'Brannon to Zvi Barzilay, December 30, 1983, Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA.
[134] Patrick O'Brannon to Zvi Barzilay, February 2, 1984, Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA.
[135] Zvi Barzilay to Patrick O'Brannon, February 24, 1984, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

this letter covered the issue surrounding the location of new townhouses and parking. Barzilay stated:

> The townhouses and parking as currently sited are already on a zoning plan approved by the Philadelphia City Council. Any changes to this zoning plan will require an amendment by Council. As has been pointed out in the past, our position is that the zoning plan has been reviewed and approved by the various historic agencies and there is very limited flexibility for changes.[136]

The SHPO was not alone in its objection to the location of parking on the front lawn; the NPS concurred with the SHPO that parking in front of Biddle Hall was unacceptable.[137]

Gary Hume, Acting Chief of the Preservation Assistance Division of the NPS, identified three major issues that emerged as a result of the SHPO's review of Toll Brothers' Historic Preservation Certification Application. These issues were: the proposal to put parking in front of Biddle Hall, the intention to widen the north gate from Gray's Ferry Avenue to allow for two-way traffic, and the proposal to enlarge the windows on the front of the main block of Biddle Hall.[138] Hume stated that of those three issues all but one, the location of parking, was resolved at a March 6, 1984, meeting with the SHPO staff, the NPS staff, Richard Tyler of the PHC, and Toll Brothers. At that meeting, the historic agencies agreed that widening the north gate could be successfully accomplished, but that the enlargement of windows in the main section of Biddle Hall was unacceptable.[139] The proposed location of parking on the front lawn was a contentious issue and no resolution was found at the meeting. Hume explained that parking on the lawn was a subject about which the NPS had "grave concerns" as "...any

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[136] Ibid.
[137] Gary Hume to Zvi Barzilay, March 15, 1984, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[138] Ibid.

plan must retain the historic setting for the landmark structures."[140] Hume continued to explain that the NPS understood the need for "substantial number of parking spaces" because of the proposed density of housing units. However, Hume explained, the lawn acted as a frontispiece for the Strickland-designed buildings and must remain as untouched as possible. He wrote:

> To try to insert as many as 65 parking spaces in this location would be unacceptable. As I stated at the meeting, maintaining the vista of Biddle Hall and the two residences from Gray's Ferry Avenue is essential. We look forward to seeing a new site plan that accomplishes that aim, even if it means reducing the number of new units built.[141]

Before the NPS could grant final approval of the project, Toll Brothers had to submit detailed drawings on the location of parking and the widening of the north gate. Toll Brothers responded to Hume's letter immediately with a letter from attorney Carl Zucker. This letter was also addressed to Brenda Barrett at the SHPO and Zucker enclosed a copy of the plan "approved" by all the historic agencies.[142] **(Figure 29)** However, this approval was *conditional* on Toll Brothers meeting certain requirements as established by Patrick O'Brannon's letter in December 1983. O'Brannon clearly stated that parking was not permitted on the front lawn. Zucker failed to mention this detail in his letter. Zucker's letter outlined the events of March 6, 1984, from Toll Brothers' perspective. He stated:

> It is understood that the development cannot proceed without resolution of the site plan issues discussed at our meeting on March 6, 1984, and it has been tentatively agreed that site plan revisions will be made by Toll Bros., Inc., without prejudice,

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[139] Ibid.
[140] Ibid.
[141] Ibid.
[142] Carl Zucker to Gary Hume and Brenda Barrett, March 16, 1984, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

in accordance with your mutual requests to reduce the number of parking spaces in front of Biddle Hall from the approved plan and to revise the orientation of the new buildings.[143]

Zucker stated that this revised plan would be forwarded at a later date and requested that upon its receipt, separate letters from the SHPO and the NPS certifying its approval be forwarded to his attention.

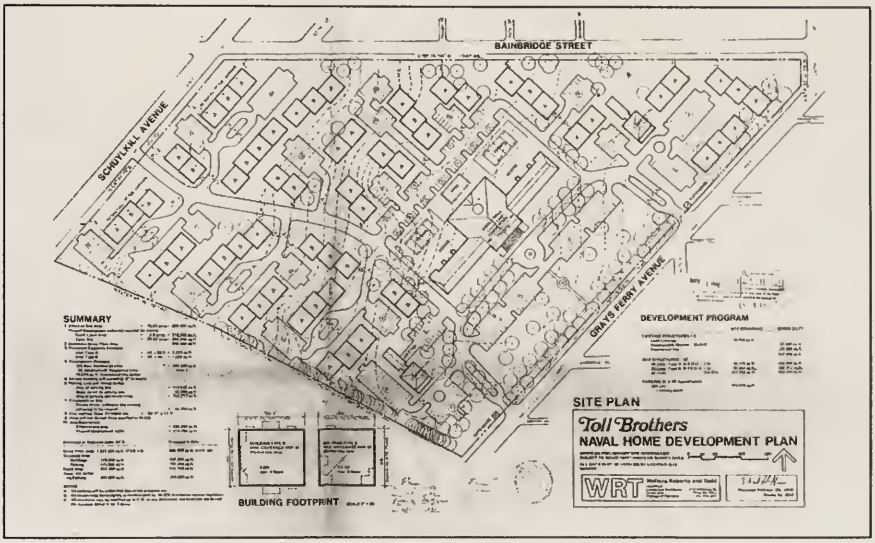

Figure 29 Site Plan approved by all historic agencies.

Toll Brothers submitted a revised plan in April 1984 and on May 10, 1984, Hume communicated the NPS comments on this plan. While the modifications that attempted to address the parking issue in front of Biddle Hall were acceptable, other changes that appeared on this plan were unacceptable. These changes involved the location of parking

[143] Carl Zucker to Gary Hume and Brenda Barrett, March 16, 1984, PA Historical and Museum Commission, Bureau for Historic Preservation. Harrisburg, PA.

placed between Biddle Hall and the Governor's Residence, between Biddle Hall and the Surgeon General's Residence, and the spaces directly in front of the Surgeon General's Residence. Hume noted that further changes in the parking design were still necessary. In addition, the size of the traffic control court, a new item on this plan, was excessive. The plan called for three lanes of traffic, a large fenced area and another gatehouse, located seventy feet behind the gate. The NPS believed this facility was the antithesis of the Park Service's objective to preserve the setting of Biddle Hall and the two residences. In order to comply with the main preservation objective (to preserve the frontal setting), Hume wrote, "parking and traffic control areas must be minimized not expanded as in the April 12 site plan."[144] Hume further remarked that because of the other issues this new plan created, the NPS could not address the issue of parking in front of Biddle Hall. Hume wrote:

> Regrettably, our attempts to deal with one issue at a time on the very complex problems of the development of this National Historic Landmark site have proven most unsuccessful because of the manner in which you make changes and introduce new elements into the development proposal. Therefore, before the National Park Service will proceed with any further review of this project, all documents must be submitted including the complete plans for the rehabilitation of Biddle Hall and the two residences.[145]

As articulated by Hume, the haphazard way in which Toll Brothers submitted its development plan created a problem in the review process. Resolution to these issues came during July and August of 1984 when Toll Brothers submitted another revised plan.

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[144] Gary Hume to Zvi Barzilay, May 10, 1984, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[145] Ibid.

This plan, dated July 7, 1984, satisfied the NPS and its preservation concerns for the setting of the three Strickland buildings.[146]

In September 1984, the NPS also responded to Toll Brothers' Part 2 tax credit application.[147] Hume informed Barzilay that there were aspects of the proposed work that needed to be explained further before preliminary certification could be made.[148] While the site design issues had already been resolved, the NPS needed additional drawings and documentation to review the project for conformance with the Secretary of the Interior's *Standards for Rehabilitation*. The NPS asked for specifications that concerned re-pointing the mortar, the stucco mix, the repair and refinishing of the veranda floors of Biddle Hall, the repair of the perimeter retaining wall, and the treatment of all interior floors. In November 1984 Barzilay informed Hume that Toll Brothers was in the process of preparing the material Hume requested in September.[149] Barzilay also thanked Hume for allowing Toll Brothers to file information on the project directly with the NPS. Barzilay wrote, "Your involvement, as you are aware, became necessary in order to simplify the encumbersome approval process and we do very much appreciate your assistance."[150] Barzilay continued that his understanding that approval from the NPS would be accepted as the approval of the SHPO and ACHP as required by the original covenants. This was too large an assumption on the part of Toll Brothers, however, as Barney Maltby, Director of the Disposal Division of the GSA, wrote to

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[146] Gary Hume to Zvi Barzilay, August 14, 1984, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[147] Gary Hume to Zvi Barzilay, September 18, 1984, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[148] Ibid.
[149] Zvi Barzilay to Gary Hume, November 21, 1984, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

Barzilay in December 1984 and explained Toll Brothers needed to provide a "...complete development plan to all of the concerned parties..." including the Philadelphia Historical Commission and the SHPO.[151] In order to meet these requirements, Toll Brothers was required to submit working drawings to the Philadelphia Historical Commission and submit the complete the Part 2 application for tax credits to the SHPO. The SHPO, upon completion of its review, would forward the application to the NPS. Maltby noted that Charlene Dwin of the Federal Advisory Council was willing to accept the NPS judgment. Maltby stated that this was the only option open to Toll Brothers other than terminating all efforts and voluntarily defaulting on their contract with the GSA.[152]

Early in 1985 Toll Brothers convened a meeting that included Gary Hume of the NPS, Barney Maltby of the GSA, Donna Williams and Dan Deibler of the SHPO, and a new party, Gary Rueben of Historic Landmarks for Living. In this meeting on March 8, 1985, Toll Brothers announced that they now planned to undertake development in a joint venture with Historic Landmarks for Living, one of the first successful developers in the United States to restore and reuse historic buildings. The advantage to working with Historic Landmarks for Living for Toll Brothers was the company's expertise in rehabilitation.[153] The concept was that Historic Landmarks would oversee the work on Biddle Hall and the two residences, and Toll Brothers would concentrate on the new construction.[154] In July 1985 Historic Landmarks for Living submitted revised Part 2

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[150] Ibid.
[151] B.C. Maltby to Zvi Barzilay, December 31, 1984, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[152] Ibid.
[153] Interview with Andrew Terhune, October 16, 2001.
[154] Interview with Andrew Terhune, October 16, 2001.

Historic Preservation Certification Applications for the Naval Home to the SHPO. These Part 2 Applications, dated July 2, 1985, were to take precedence over any prior written documents.[155] The applications submitted stated the work was to begin in September 1985 and be completed by September 1987. The application called for three hundred twenty-five new housing units in addition to the sixty-five units in Biddle Hall, the same number indicated on the July 1982 application. The SHPO reviewed and forwarded the applications to the NPS on August 13, 1985.[156]

In October 1985 Gary Hume responded for the NPS.[158] Hume first reiterated the previously agreed understandings reached in various meetings and site visits. **(Appendix B)** Hume also stated that the Part 2 application was approved subject to two conditions being met. The first condition concerned the original wood trim in Biddle Hall, and the second concerned the proposed fence to enclose the entrance gate. Hume stated:

> All original wood trim in Biddle Hall, removed as part of the furring out and insulating of the external masonry walls, is to be carefully reinstalled in its original location. This is specifically a requirement for the second floor, but is a general requirement for all windows surrounds, bases, chairrails, etc., that remain in place and are from the earliest period of construction.
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> The masonry base of the fence enclosing the entrance gate compound will be eliminated from the design to minimize the impact of this fencing on the historic setting.[159]

Hume also stipulated that if Toll Brothers proposed any changes or amendments to the plan, those changes must first be submitted to the SHPO. Once the SHPO reviewed the

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[155] Gary Rueben to Gary Hume, July 19, 1985, Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA.
[156] Gary Hume to Zvi Barzilay, October 17, 1985, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[158] Ibid.
[159] Gary Hume to Zvi Barzilay, October 17, 1985, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

changes, the revised plan would be submitted to the NPS to ensure conformance with the above conditions and the Secretary of the Interior's *Standards for Rehabilitation*.

Contemporaneously with approval from the NPS, a letter to Zvi Barzilay dated December 19, 1985, from Don Klima, Chief, Eastern Division of Project Review of ACHP, expressed his organization's view of Toll Brothers' revised proposal. The ACHP found the revised proposal acceptable provided Toll Brothers fulfilled the following conditions:

> 1. Any major modifications for new construction or the rehabilitation of Biddle Hall as presented in the plans dated October 31, 1985, would be forwarded to the SHPO and the ACHP for their review and approval.
> 2. Plans for the rehabilitation and reuse of the Governor's Residence and Surgeon General's Residence were required to be submitted to the SHPO and the ACHP for review and approval prior to any construction.
> 3. Prior to the demolition of Laning Hall, Toll Brothers was required to document the structure. The appropriate level of documentation was to be determined by Historic American Buildings Survey, a division of the NPS. [160]

Klima asked Barzilay to sign and return the letter to record agreement to the indicated conditions. It does not appear that Barzilay signed and returned the letter.[161] In January 1986 Barzilay received a letter from Donna Williams of the SHPO informing him the state accepted and approved Toll Brothers revised proposal.[162]

After obtaining these approvals, Historic Landmarks for Living completed its own economic analysis of the project and determined that the proposed renovation was not

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[160] Don Klima to Zvi Barzilay, December 19, 1985, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[161] The letter found in the files at the PA Bureau for Historic Preservation was not signed by Barzilay.
[162] Donna Williams to Zvi Barzilay, January 21, 1986, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

economically feasible.[163] Consequently, the agreement Toll Brothers had with Historic Landmarks to develop the site dissolved and the partnership collapsed.[164] Andrew Terhune indicated that the attraction to developers of historic rehabilitation work decreased because the Tax Reform Act of 1985 lowered the tax credit from 25 percent to 20 percent.[165]

In January 1987, during the Architectural Committee meeting of the PHC, the Committee discussed the demolition permit for Laning Hall that had already been issued in 1983 in the context of the new 1985 ordinance. The Department of Licenses and Inspection extended the permit several times between 1983 and 1987.[166] The last extension expired on March 26, 1987. Richard Tyler, Historic Preservation Officer of the PHC wrote:

> In February 1987, the Law Department, as counsel to the Commission, requested the Department of Licenses and Inspections not to renew the demolition permit for Laning Hall upon its expiration on 26 March 1987, a full four years after its issuance and just days short of two years after the effective date of the new ordinance.[167]

In February Mark MacQueen, Assistant City Solicitor, composed a letter to Roland Hall, Chief of the Construction Section with the Department of Licenses and Inspections (L&I), and requested that L&I "...refrain from granting any further extensions on the

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[163] Toll Brothers, "History of the Naval Home." Courtesy of Andrew Terhune, Special Projects Manager at Toll Brothers, Inc.
[164] Ibid.
[165] Interview with Andrew Terhune, October 16, 2001.
[166] The Department of Licenses and Inspection renewed the demolition permit for periods of ninety days. Correspondence between David Wismer to Toll Brothers, Inc., December 19, 1983 and Roland Hall to Zvi Barzilay, December 23, 1986.
[167] Richard Tyler to Patricia Bailey, September 10, 1987, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Philadelphia, PA.

permit allowing the demolition of buildings on the Naval Home site at 2420 Grays Ferry Avenue."[168] Upon receipt of that letter, Hall wrote to Zvi Barzilay in March and informed him that Toll Brothers application for an extension of permit Number 82056 was denied.[169] Hall informed Barzilay that due to revisions to Section 14-2007 of the Philadelphia Zoning Code, Toll Brothers had to resubmit a new application and that application was subject to laws in effect on the date of the application.[170] This included the new preservation ordinance that required approval from the PHC in order for the Department of Licenses to issue a building permit for the demolition of Laning Hall.

One month later in April, Jerry Rogers, Associate Director of Cultural Resources for the NPS, wrote to John Neale, Jr., Assistant Commissioner of the Office of Real Property Policy and Sales at the GSA, and stated the NPS had "grave concerns" about the preservation status and condition of the Naval Home. The final conveyance of the Naval Home had not yet taken place, as Toll Brothers had requested and received several extensions of the contract for sale. Therefore, as Rogers stated:

> ...no work has been undertaken on these buildings for at least ten years. We are concerned that these nationally important buildings will continue to sit vacant, unheated and without maintenance, literally rotting away, unless the developer takes title to the property and begins work on the buildings. This increasing deterioration is also affecting their historic and architectural integrity.[171]

Rogers requested that the sale of the Naval Home be executed at the end of the current contract extension. The ACHP also wrote a similar letter in June 1987 stating that the

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[168] Mark MacQueen to Roland Hall, February 20, 1987, Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA.
[169] Roland Hall to Zvi Barzilay, March 10, 1987, Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA.
[170] Roland Hall to Zvi Barzilay, March 10, 1987, Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA.

ACHP endorsed the NPS recommendation to conclude the sale of the property to Toll Brothers.[172]

Toll Brothers wrote a response to the ACHP in July 1987, attempting to explain the reasons for delay in closing the sale on the Naval Home. Douglas Gamble, Project Manager for Toll Brothers, stated the action of the PHC was responsible for the delay. Gamble wrote, "The net result of the action of the Historical Commission of Philadelphia is to delay the project and to possibly significantly downgrade the economics of the development."[173] Gamble explained that in Toll Brothers' view it was unfair to "change the rules in the middle of the game" because Toll Brothers had paid $532,400 as of July 1987 for the maintenance of the site. Gamble also explained that on May 21, 1987, per a request from the PHC for more information supporting the demolition of Laning Hall, Toll Brothers presented reports from its consultants that demonstrated the economic infeasibility of the rehabilitation of Laning Hall. During that presentation Toll Brothers provided a letter from its architect, Elliot Rothschild, that described the possibility of converting Laning Hall into forty-six small one-bedroom apartments, but that the layout was inefficient.[174] In addition to Rothschild's analysis, Richard W. Huffman of WRT, submitted a letter that stated, "feasibility of renovation is worse in 1987 than in 1980"

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[171] Jerry Rogers to John Neale, Jr., April 17, 1987, Naval Home File, PA Historical and Museum Commission, Bureau of Historic Preservation, Harrisburg, PA.
[172] Don Klima to John Neale, Jr., June 12, 1987, Naval Home File, PA Historical and Museum Commission, Bureau of Historic Preservation, Harrisburg, PA.
[173] Douglas Gamble to Don Klima, July 7, 1987, Naval Home File, PA Historical and Museum Commission, Bureau of Historic Preservation, Harrisburg, PA.
[174] Elliot Rothschild to Zvi Barzilay, April 27, 1987, Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA.

and suggested the entire project may be in jeopardy by the reuse of Laning Hall.[175] Gamble reported that as of July, Toll Brothers was still waiting for a response to this presentation.

In August 1987 Patricia Bailey, Acting Director of the Office of Real Estate Sales of the GSA, informed the PHC that the GSA intended to close its contract with Toll Brothers no later than March 1988.[176] The GSA contract with Toll Brothers was contingent on Toll Brothers receiving all necessary local, state, and federal approvals to develop the site with no less than 200 dwelling units. Richard's Tyler's response to this letter came on September 10, 1987, in which he outlined the involvement of the PHC with the Naval Home since 1982 when Toll Brothers entered into agreement with the GSA. Tyler stated during the May 21, 1987, meeting the Chairman of the Architectural Committee noted that in order to review Toll Brothers' application for demolition, the Committee needed information detailed in Section 7(f)(.1-.7) of the new preservation ordinance.[177] The PHC also had its own consultant conduct an analysis of Laning Hall. In December 1987 Reaves C. Lukens, Jr., a real estate appraiser and consultant submitted his report to the Historical Commission and his conclusion stated, "...that it is not economically feasible at this time to rehabilitate Laning Hall for multi-residential purposes or for any other economic use and we therefore suggest that it be

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[175] Richard W. Huffman to Douglass R. Gamble, May 18, 1987, Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA.
[176] Patricia Bailey to Richard Tyler, August 27, 1987, Naval Home File, PA Historical and Museum Commission, Bureau of Historic Preservation, Harrisburg, PA.
[177] Richard Tyler to Patricia Bailey, September 10, 1987, Naval Home File, PA Historical and Museum Commission, Bureau of Historic Preservation, Harrisburg, PA.

demolished."[178] Therefore, as the end of 1987 approached, Toll Brothers had not implemented any stabilization plan nor had any of their proposals been implemented. In October 1987 Leonard Wolffe, counsel to Toll Brothers, requested that the PHC cancel its request to L&I to deny an extension of the demolition permit and promised that Toll Brothers would take action to halt the deterioration of the historic buildings immediately.[179] The PHC did not honor this request, and, as Joseph A. Slobodzian reported in *The Philadelphia Inquirer*, Toll Brothers threatened to sue the city and the Philadelphia Historical Commission if the firm did not receive the permits needed to redevelop the Naval Home before the GSA's March 17, 1988 deadline.[180]

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[178] Reaves C. Lukens, Jr. to Richard Tyler, December 24, 1987, Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA.
[179] Leonard Wolffe to Richard Tyler, October 23, 1987, Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA.
[180] Joseph A. Slobodzian, "Developer threatens to sue city over Naval Home permits," *The Philadelphia Inquirer*, December 31, 1987, 3-B.

II. 1988 to 1993: The Consequent Demolition of Laning Hall

Through early 1988, the PHC and Toll Brothers battled over who was at fault for the delay in the project. In a letter to Zvi Barzilay, Richard Tyler wrote that Mr. Leonard Wolffe, attorney for Toll Brothers, had accused the PHC of preventing progress on the Naval Home Project. Tyler countered that "...it is clear from the history of this matter that it is Toll Brothers that has prevented the project from going forward by not having submitted the appropriate applications, as both the Department of Licenses and Inspections and the Commission have advised it to do."[181] Along with letters from the PHC, the Preservation Coalition of Greater Philadelphia, an historic preservation interest group wrote numerous letters throughout 1987 and 1988 to the GSA, Senator Arlen Specter, and Congressman Thomas Foglietta, among others, to express its concern about the lack of maintenance of the buildings on the Naval Home site.[182] The lengthy delay of the sale because Toll Brothers did not have all the necessary approvals in place increased deterioration of the buildings. James Biddle, then Chairman of the Preservation Coalition wrote, "We continue to be concerned about the lack of maintenance of the historic buildings and would like to see a procedure established promptly with GSA's assistance so that demolition by neglect can be avoided."[183] Though these letters presented no legal obligation on Toll Brothers, they reflect the increasingly political nature of discussion

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[181] Richard Tyler to Zvi Barzilay, January 15, 1988, Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA.

[182] Numerous letters in the Naval Home File at the Preservation Alliance for Greater Philadelphia, including:
James Biddle to Terrance Golden, January 9, 1987
James Biddle to Congressman Thomas Foglietta, August 12, 1987, January 18, 1988,
James Biddle to Senator Arlen Specter, August 12, 1987, January 28, 1988.

[183] James Biddle to Thomas Foglietta, January 18, 1988, Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA.

about the reuse of the Naval Home and increased the pressure on GSA to close the sale. Toll Brothers responded to these letters on February 12, 1988. Douglas Gamble wrote to Congressman Foglietta and claimed that Biddle's letter on January 18, 1988, contained "...several misleading and inaccurate and unsupportable assertions. Apparently Mr. Biddle has elected to disregard the facts which he is most certainly aware of and to undermine our continuing attempts to develop this important property."[184] Gamble stated that there was one issue on which Biddle and Toll Brothers agreed: the unnecessary delays the projects suffered contributed to the deterioration of the three Strickland buildings. Concurrently with these debates, on March 10, 1988 Toll Brothers and GSA completed the sale and the company legally held the title to the Naval Home.[185]

In March 1988 Kathryn Lewis, First Deputy City Solicitor, wrote to John Plonski, Commissioner of the Department of Licenses and Inspections, to clarify Mark MacQueen's letter of February 20, 1987. **(Appendix C)** Lewis explained that the intent of that letter was to request L&I to consider that Section 14-2007 had been amended and take that into account when considering whether to grant further extensions of the demolition permit for Laning Hall. Lewis stated that L&I "...was not prohibited as a result of Section 14-2007, as amended, from granting or denying further extensions of this Permit."[186] Lewis recommended that L&I reconsider its decision and take action the department deemed appropriate concerning an extension of the demolition permit. John

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[184] Douglas Gamble to Thomas Foglietta, February 12, 1988, Naval Home File, PA Bureau for Historic Preservation, Harrisburg, PA.
[185] Thomas Hine, "Home-building firm buys U.S. Naval Home." *The Philadelphia Inquirer*, March 19, 1988, 1-B, 4-B.
[186] Kathryn Lewis to John Plonski, March 9, 1988, Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA.

Plonski, Commissioner of L&I promptly responded on March 22, 1988, and reinstated the permit for one ninety-day period that expired on June 30, 1988.[187] Subsequently, the Preservation Coalition filed an appeal on Friday, April 15, 1988, objecting to the action taken by L&I.[188] The basis of the appeal was that L&I had no power to revive a lapsed permit per Sections 105.1 and 105.8 of the Philadelphia Building Code.[189] In order to bolster the case of the Preservation Coalition, Christopher solicited help from the Center City Residents' Association, a civic association that represents the area directly to the north of the Naval Home.[190] The appeal was heard on May 17, 1988, before the Board of License and Inspection Review. In September the Board sustained the position of the City.[191] The Preservation Coalition brought an appeal before the Court of Common Pleas in Philadelphia on October 27, 1988.[192] In October the Preservation Coalition, in conjunction with the Center City Residents' Association, applied for a grant from the Preservation Fund of Pennsylvania to conduct another reuse study that addressed the placement of new construction on the site and the reuse of Laning Hall. While Preservation Fund awarded the grant, Toll Brothers was not willing to grant the staff of the Preservation Coalition access due to the pending suit,[193] and ultimately the grant had

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[187] John Plonski to Zvi Barzilay, March 22, 1988, Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA.
[188] Christopher Stouffer to James M. Scott, April 20, 1988, Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA. (Appeal No. 25016)
[189] Ibid.
[190] Christopher Stouffer to Stephen Huntington, April 29, 1988, Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA.
[191] Christopher Stouffer to Mary Lou McFarland, October 4, 1988, Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA.
[192] The Preservation Coalition of Greater Philadelphia v. Board of License and Inspection Review of the City of Philadelphia, Court of Common Pleas, No. 4971, October term, 1988, Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA.
[193] James Biddle to Robert Toll, January 29, 1989, Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA.

to be returned because of the dearth of cooperation between Toll Brothers and the historical agencies. From 1989 to May 1991, when the litigation surrounding Laning Hall was ultimately resolved, little stabilization or maintenance work occurred on the grounds of the Naval Home and the condition of the buildings worsened.

In November 1989 a concerned citizen, Miles Ritter, a resident of 2349 St. Albans Place, informed Richard Tyler of vandalism and looting that occurred on the Naval Home site. Ritter reported that he observed vandals jumping the fence, stripping the property of its materials and the guards' disinterest in the problem.[194] Other contemporaneous reports of the site's condition came from Thomas Hine, the architecture critic for *The Philadelphia Inquirer.* Hine wrote, "Even from the street, you can see plants growing out of the fabric of the buildings, bricks falling from one structure, windows that have been unsealed by scavengers, and pieces of the wall around the complex collapsing."[195] Hine also noted that in the context of the real estate market in Philadelphia, "Earmarked for residential development the complex has come through one of the biggest real-estate booms in the city's history without any attention. Now it must weather a year in which credit is likely to be tighter and fewer things will be built or rehabilitated."[196] Hine's conclusion was that the Naval Home was a test to determine if the city is capable of preventing Toll Brothers from "...allowing the structure to deteriorate so badly that it is,

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[194] Miles Ritter to Richard Tyler, November 9, 1989, Naval Home File, Philadelphia Historical Commission, Philadelphia, PA.
[195] Thomas Hine, "Naval Home, anchors decay," *The Philadelphia Inquirer,* December 2, 1990, 1-1.
[196] Hine, "Naval Home, anchors decay," 6-I.

in effect, demolished."[197] Throughout 1990 the Preservation Coalition's pending suit delayed any forward progress of the redevelopment of the Naval Home.

In February 1991 L&I inspected Laning Hall and determined that the building was imminently dangerous because "The exterior wythe of brick has collapsed from the roof to the third level. The backup brickwork has collapsed leaving the fourth floor exposed. The roof has partially collapsed."[198] L&I served Toll Brothers with a violation report on February 11, 1991, that stated Laning Hall was imminently dangerous and ordering Toll Brothers to demolish the building immediately. Toll Brothers, however, did not act to repair or demolish Laning Hall, and in April the City brought suit against Toll Brothers.[199] Toll Brothers moved to join the Preservation Coalition and Center City Residents' Association to this suit, as the company claimed that the appeal brought by the two organizations prevented Toll Brothers from complying with the City's demand to demolish Laning Hall. On May 3, 1991, Stouffer reported to Howard Kittell, then Executive Director of the Preservation Coalition, on actions that transpired on May 2, 1991, before Judge Russell Nigro. Stouffer stated, "The Court entered an order ... commanding Toll Brothers to repair or demolish Laning Hall. Additionally, at the urging of the court, Toll withdrew its motion to join the Coalition and CCRA."[200] **(Appendix C)**

Laning Hall was subsequently razed in 1991 along with Biddle Hall annex and other smaller structures as shown on the original plan submitted in 1983. **(Figure 30)**

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[197] Hine, "Naval Home, anchors decay," 6-I.
[198] Violation Report No. 55212, Department of Licenses & Inspections, Philadelphia, PA. February 6, 1991, Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA.
[199] City of Philadelphia v. Toll Naval Associates, No. 3022, Court of Common Pleas, Philadelphia, April 22, 1991, Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA.
[200] Christopher Stouffer to Howard Kittell, May 3, 1991, Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA.

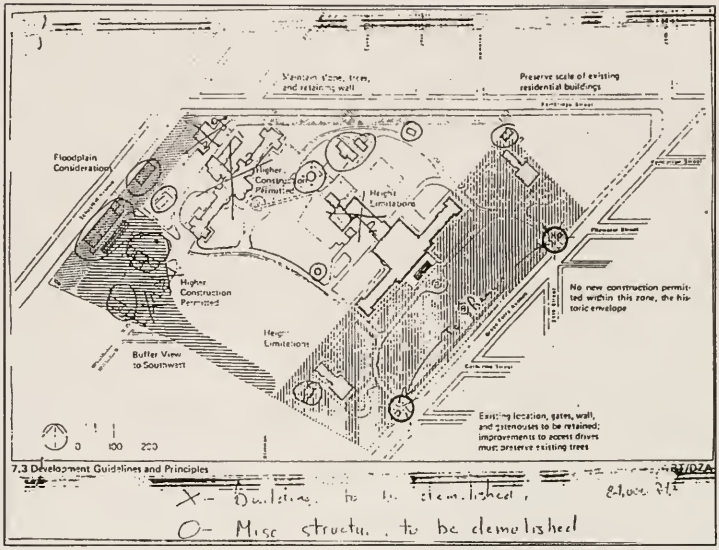

Figure 30 Demolition plan that called for Laning Hall and the Biddle Annex to be razed, 1983.

From 1992 to 1993, there was no action by Toll Brothers to redevelop the site. As previously noted, the real estate market in Philadelphia during this period suffered and little new construction or rehabilitation occurred. In 1994, Toll Brothers began its second major effort to design a redevelopment scheme for the Naval Home.

III. 1994 to 2000: Toll Brothers' Second Attempt for Approval

The period from 1994 to 2000 was distinguished from the first two in that the plans and discussions centered on conceptual designs. Toll Brothers did not want to proceed to the architectural details of the design before the PHC, ACHP, SHPO, and NPS approved its conceptual plan.[201]

Early in 1994, Toll Brothers advanced a new plan for developing the Naval Home site. This plan departed significantly from the 1984 plan which had been approved in 1985-1986. The plan called for 1,200 dwelling units in four L-shaped towers that ranged in height from seventeen to twenty-two stories, with underground parking.[202] This design, by WRT, placed the towers towards the rear of the property along Schuylkill Avenue. The historic agencies favored this plan because it concentrated the development on the rear of the site, and the front lawn remained untouched.[203] Along with the high rises, townhouses were planned for the Banbridge Street edge. **(Figure 31)** The entire development was conceived as a gated community closed off from the surrounding neighborhood. Andrew Terhune was the project manager of the Naval Home project in 1994. As reported by Earni Young, a writer for *The Philadelphia Daily News,* Terhune said that there was no time frame for the project, but that Toll anticipated an improvement in the real estate market that would make such a project profitable in three years.[204] The plan was a "preliminary design concept", lacking details on the site plan and perspective rendering, illustrating that Toll Brothers had not determined the specific

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[201] Interview with Andrew Terhune, October 16, 2001.
[202] Ibid.
[203] Ibid.
[204] Earni Young, "Navy Home rehab," *The Philadelphia Daily News,* January 27, 1994, 25.

features of the plan. **(Figure 32)** Toll Brothers seems to have been testing the water, as Terhune said, "This is our first project inside the city limits. We're approaching it with an open mind, and hope the residents will too."[205]

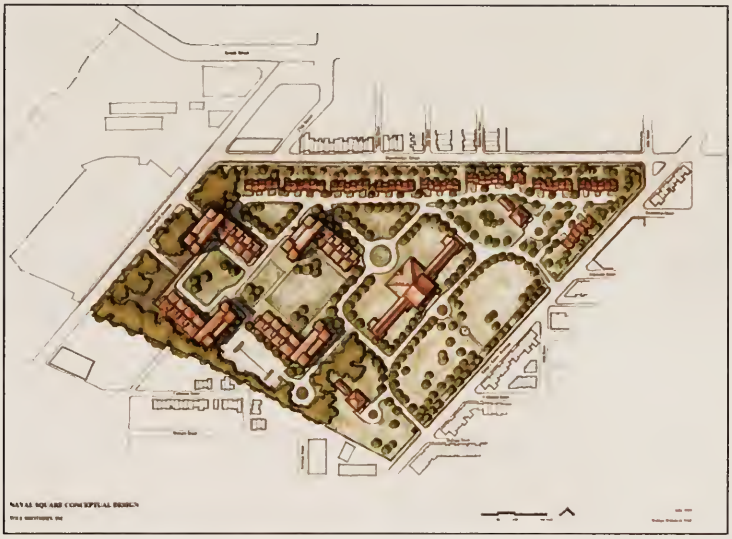

Figure 31 Site Plan designed by Wallace Roberts Todd, 1994.

[205] Young, 25.

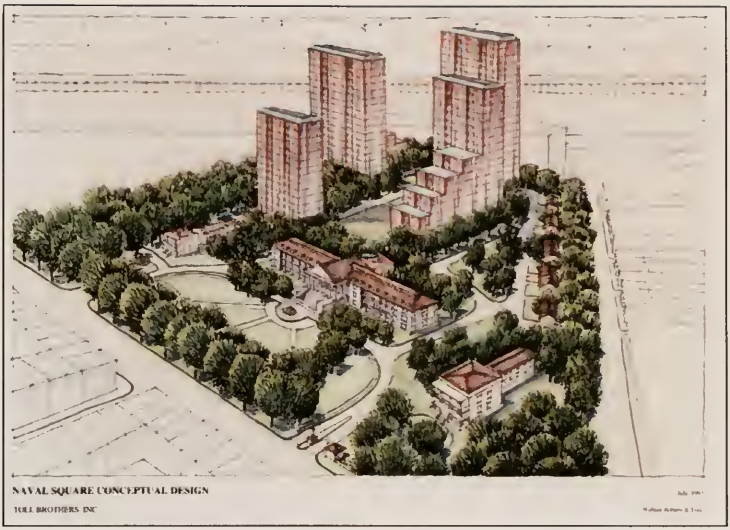

Figure 32 Perspective Rendering of Wallace Roberts Todd plan, 1994.

Before seeking approvals from the historic agencies, Toll Brothers wanted community response. Several community leaders had the opportunity to view Toll Brothers' plans, but their reactions were not complimentary. Stanley White of Congressman Thomas Foglietta's office was disappointed that the project ignored the neighborhood.[206] In April 1994 Thomas Hine wrote that Toll Brothers' strategy was to present to the community to see if high-rise housing aroused community opposition.[207] Hine wrote, "The plan that Toll Bros. unveiled is terrible, but that is in keeping with the peculiar ritual in which it is engaged. When you start with something as crude and

[206] Young, 27.
[207] Thomas Hine, "Floating a plan for Naval Home land," *The Philadelphia Inquirer,* April 3, 1994, F1, F6.

rudimentary as this plan, anything the developer does will look like a big improvement."[208] Another major criticism of this plan was it did not address the historic buildings.[209] Ultimately, Toll Brothers abandoned this plan because the company determined that residential high-rises had achieved little success in Philadelphia and therefore a plan that depended on high-rise buildings was very risky for Toll Brothers and not economically feasible.[210]

In 1996 Toll Brothers engaged Goody Clancy & Associates, a Boston architectural firm, to develop a schematic design for the redevelopment of the Naval Home. This design was discussed at a special meeting of the Architectural Committee of the PHC on September 17, 1996. Andrew Terhune presented the site plan and described the development as a mixture of low-, mid-, and high-rise buildings. This scheme also called for a "...gated community with convenient access to the amenities in the area at moderate prices."[211] This plan, like the previous WRT plan, called for 1,200 units on the site. At the meeting in September, Terhune explained the first phase of development would involve three mid-rise buildings on the corner of Banbridge and 24th Streets. The proposal called for townhouses along Banbridge Street that reflected the existing two story rowhomes located across the street. The remainder of the site was to include a mixture of mid- and high-rise buildings. **(Figures 33 and 34)** Parking was to be located underground with at least one space for each unit. According to this plan, the front lawn,

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[208] Hine, "Floating a plan for Naval Home land," F6.
[209] Ibid.
[210] Interview with Andrew Terhune, October 16, 2001.
[211] Report of the Special Architectural Committee Meeting, Philadelphia Historical Commission, September 17, 1996, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

fence, and Biddle Hall would remain intact, but the Governor's Residence and the Surgeon General's Residence were to be demolished. Terhune projected that the planning and design development process would take two years and the condition of the real estate market would determine the start of construction.[212] The Architectural Committee, led by its Chairman, Arlene Matzkin, questioned the demolition of the two dependencies. In addition, Barbara Kaplan, Executive Director of the Philadelphia Planning Commission, and Dan Deibler from the SHPO objected to the removal of the dependencies. The demolition of the two dependencies was deemed unacceptable and ultimately Toll Brothers abandoned this plan.[213] Dan Deibler wrote, "There seemed to be some consensus that the site needed to be restudied; that alternatives needed to be presented and discussed and that the phasing needed to be presented in a visual format and demolition of the dependencies was unacceptable."[214] Objections from the preservation community were widespread upon learning the plan called for the demolition of the two dependencies. Milton Marks, vice president of the Preservation Alliance for Greater Philadelphia, called it a case of "demolition by neglect."[215] Wayne Spilove, chairman of the PHC said, "A good-faith gesture would be to clean it up, cut the grass, make it more attractive."[216]

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[212] Ibid.
[213] Interview with Andrew Terhune, October 16, 20001.
[214] Dan Deibler to US Naval Asylum NR File, September 18, 1996, PA Bureau for Historic Preservation, Harrisburg, PA.
[215] Ralph Cipriano, "Naval Home neighbors say the site is going to seed," *The Philadelphia Inquirer,* June 10, 1996, B5.
[216] Ibid.

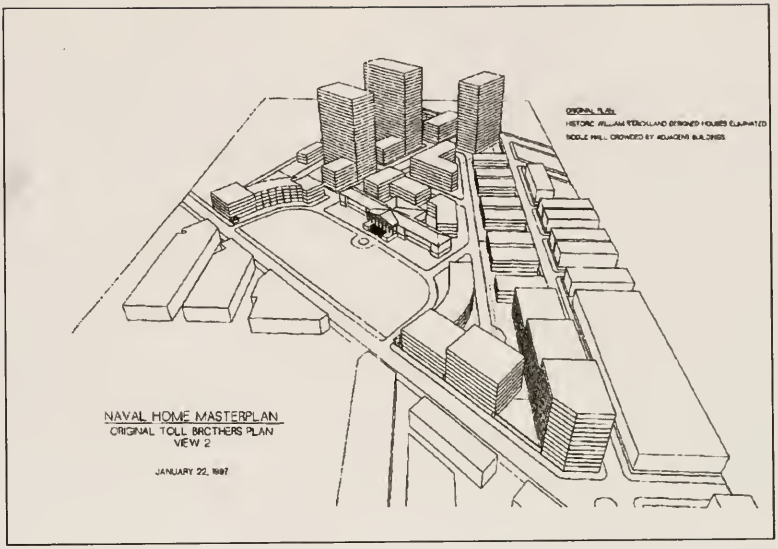

Figure 33 Goody Clancy Plan called for the elimination of the Governor's Residence and Surgeon General's Residence, View 1.

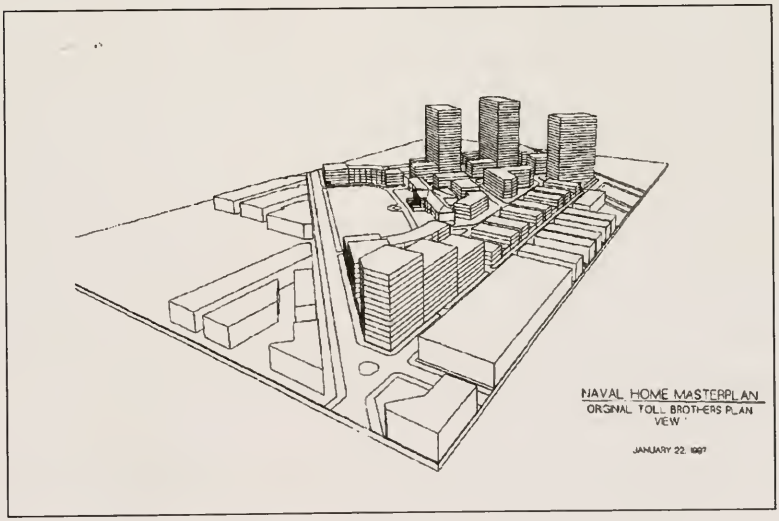

Figure 34 Goody Clancy Plan called for a variety of mid-rise and high-rise structures, View 2.

When Toll Brothers disclosed the Goody Clancy Plan in 1996, the Preservation Alliance for Greater Philadelphia became very concerned about the developer's plan to eliminate the two dependencies. The Alliance took an active role, and urged by the PHC, the SHPO, and the NPS, the Preservation Alliance applied for a grant to support a new development analysis of the Naval Home.[217] The City also asked the Preservation Alliance to take a role in the Naval Home to determine if an acceptable solution could be found.[218] On December 10, 1996, representatives from Toll Brothers, the Philadelphia Historical Commission, and Preservation Alliance met with Herb Vederman, Mayor Rendell's Deputy Mayor for Economic Development.[218] The Preservation Alliance's goal was twofold: to demonstrate how to preserve the most historically significant area of the site and to determine how the owner could realize an acceptable rate of return on its investment. In order to reach this goal the Preservation Alliance planned to hire two consultants. The first was a real estate expert to determine if the development assumptions were valid, and the second an architectural firm to analyze the historic buildings and front lawn and create a design solution that would be acceptable to governmental regulators, the owner, and the community.[219] In November 1996, Preservation Pennsylvania awarded a $20,000 grant to the Preservation Alliance in support of the Alliance's advocacy effort to work on the Naval Home. Though there was

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[217] Milton Marks to Caroline Boyce, October 16, 1996, Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA.

[218] Milton Marks to Brenda Barrett, Bill Bolger, and Caroline Boyce, December 11, 1996, Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA.

[219] Preservation Alliance for Greater Philadelphia, *Philadelphia Intervention Fund Grant Application*, October 16, 1996, Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA.

no legal agreement between Toll Brothers and the Preservation Alliance, Toll Brothers allowed the Preservation Alliance to access the site and the company participated in meetings with the Alliance.[220]

The Alliance hired Stanley Taraila of Renaissance Properties to conduct a real estate analysis of the Goody Clancy plan. His analysis showed that the plan called for more building coverage and floor area ratio than was required to build 1,200 residential units. In addition, the plan did not comply with RC-6 zoning, the zoning Toll Brothers had sought in 1983. RC-6 zoning allowed both residential and commercial uses and also permitted clustering of condominium buildings, allowing the use of the existing roads on the site. Before Toll Brothers petitioned for the RC-6 Zoning, the lot was zoned for twin houses, which would have required the construction of new streets in a grid pattern. Taraila wrote,

> The plan seems to represent a layout that would illustrate all possible building configurations so that they would have the maximum freedom to mix and choose building layouts in the future. There is certainly more than enough room on the site to achieve a sensitive layout that would preserve the three major structures and allows...Toll's stated goal of 1,200 units within the indicated mix of building types.[221]

Taraila speculated that Toll's objection to reusing the two dependencies was that in their current condition they were too expensive to maintain or rehabilitate. The Preservation Alliance worked to create a new site plan that they presented to Toll Brothers in March 1997. Toll Brothers indicated that the Preservation Alliance's plan did not satisfactorily

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[220] Milton Marks to Brenda Barrett, Bill Bolger, and Caroline Boyce, December 11, 1996, Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA.

[221] Stanley Taraila, "Naval Home: Summary Analysis," January 7, 1997, Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA.

meet the company's development needs.[222] According to Terhune, Toll Brothers "slowly abandoned" the Goody Clancy plan for two reasons: the objections from the preservation community over the demolition of the two dependencies and the cost of the underground could not be economically justified in the mid 1990s.[223]

While working with the Preservation Alliance in 1997, Toll Brothers hired a new architectural firm, Lessard & Associates of Alexandria, Virginia. Andrew Terhune described the Lessard & Associates plan as a refinement of the Goody Clancy plan.[224] The main difference between the Goody Clancy plan and the Lessard & Associates plan was that the latter plan retained the Governor's and Surgeon General's Residences. In addition the townhouses in this plan were positioned adjacent to the dependencies and the front lawn. The Lessard plan included a mixture of low- and mid-rise structures, but most of the new construction sites were placed behind the existing buildings. **(Figures 35 and 36)** The plan included parking on the front lawn, but this parking would be sheltered from public view by an earthen berm or plantings. Once Toll Brothers disclosed this plan in May 1997, the Preservation Alliance attempted to modify it so that it would be acceptable to the preservation community, including the SHPO, ACHP, PHC, and the NPS. The Preservation Alliance hired Voith and Mactavish Architects as its architectural consultants and the firm produced two plans.

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[222] "Naval Home Conference," June 5, 1997, Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA.
[223] Interview with Andrew Terhune, October 16, 2001.
[224] Ibid.

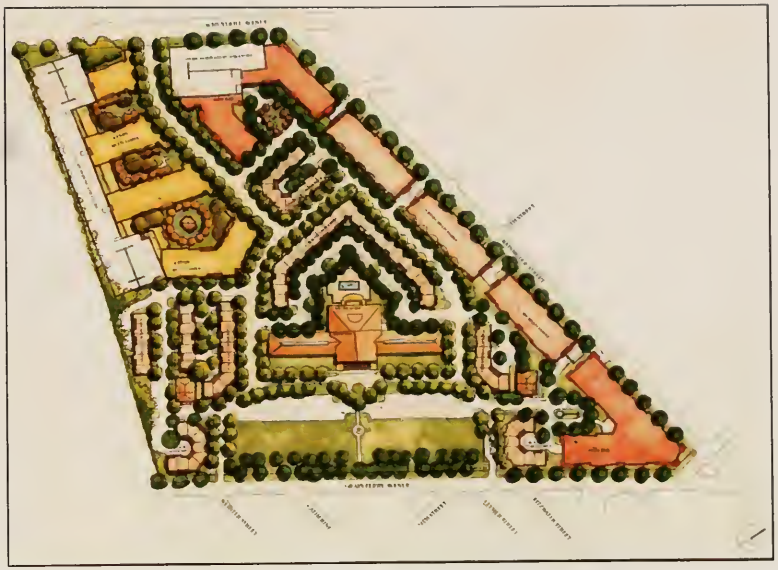

Figure 35 Lessard & Associates Conceptual Plan, May 1997.

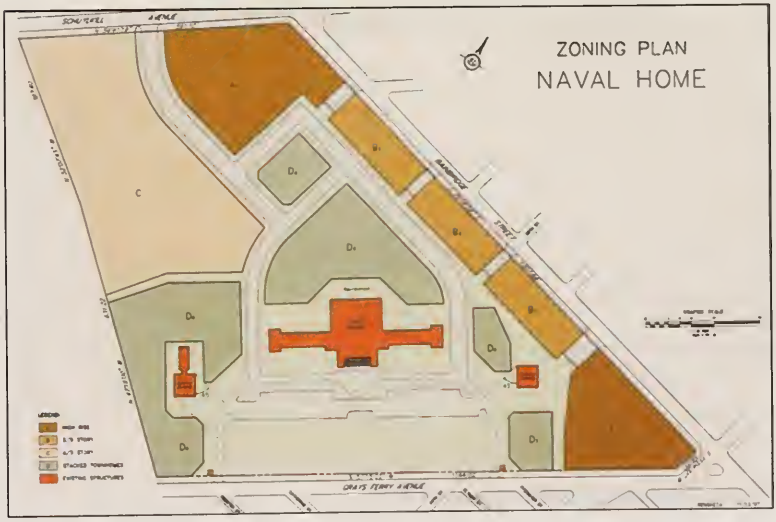

Figure 36 Zoning Plan that accompanied the Lessard & Associates plan in 1997.

The first plan modified the Lessard & Associates plan in two ways: it included the additions to the rear of the dependencies and it attempted to enlarge the view corridor between the dependencies and Biddle Hall.[225] **(Figure 37)**

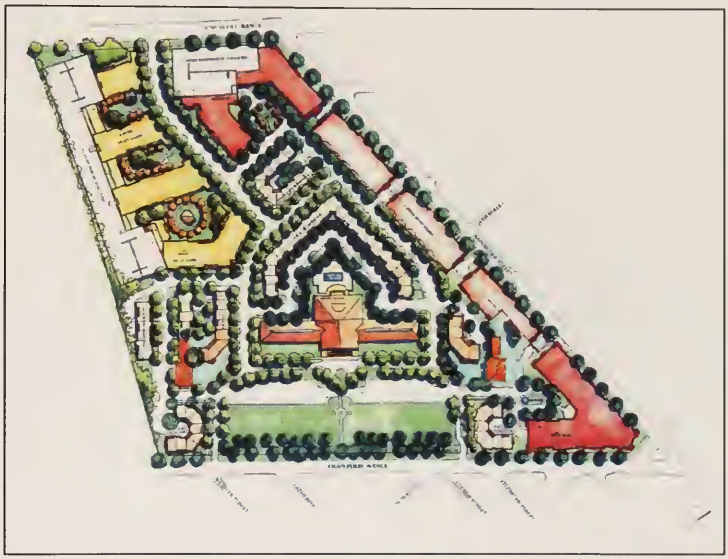

Figure 37 The Preservation Alliance Modified Plan, No. 1, 1997.

When the Alliance presented this plan to the NPS and the SHPO the agencies did not agree the plan was acceptable.[226] However, the historical agencies did agree to meet to generate a final plan that would be acceptable to the NPS, the SHPO and the Preservation

[225] "Naval Home Conference", June 5, 1997, Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA.
[226] "Naval Home Conference", June 5, 1997, Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA.

Alliance. Voith and Mactavish generated an alternative plan to reflect the concerns of the NPS and SHPO. **(Figure38)**

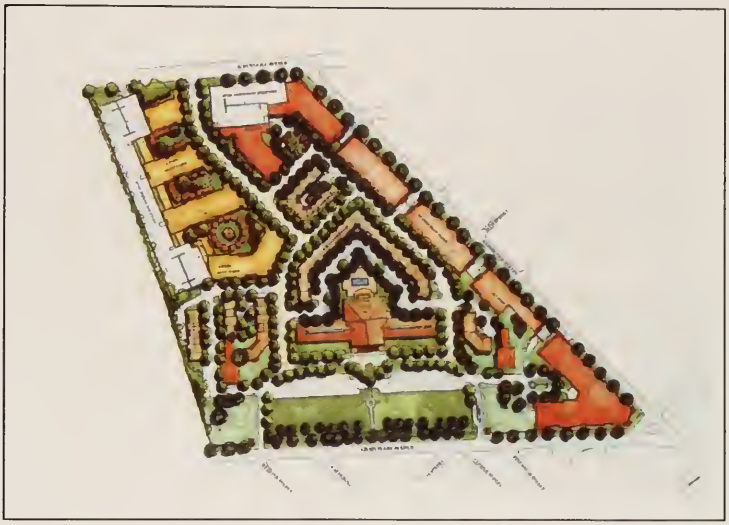

Figure 38 The Preservation Alliance Modified Plan No. 2, 1997.

On June 5, 1997, a conference was held in Philadelphia attended by twelve individuals who represented the Pennsylvania Historic and Museum Commission, Preservation Pennsylvania, the National Trust for Historic Preservation, the National Park Service, the Philadelphia Historical Commission, and the Preservation Alliance.[227] The conference was led by Don Meginley, then President of the Preservation Alliance. The goal of the conference was "to reach consensus on a final plan for the development of the Naval Home." At the conclusion of the conference Meginley drafted the resolution agreed upon by the various participants. Rather than offering design changes to a

specific plan, the task force offered a statement that explained what Toll Brothers was required to do to meet the preservation requirements on the project.[228] **(Appendix D)** The statement required Toll Brothers to retain all portions of Biddle Hall and the two dependencies, maintain through stabilization the three historic structures, preserve the visual and spatial relationships between Biddle Hall and its dependencies along with the views of the three buildings from Grays Ferry Avenue, and donate a façade and open-space easement for the historic buildings and their setting.[229] Along with the statement, the Preservation Alliance provided a schematic diagram that showed the area of the site in which no new construction was allowed. **(Figure 39)**

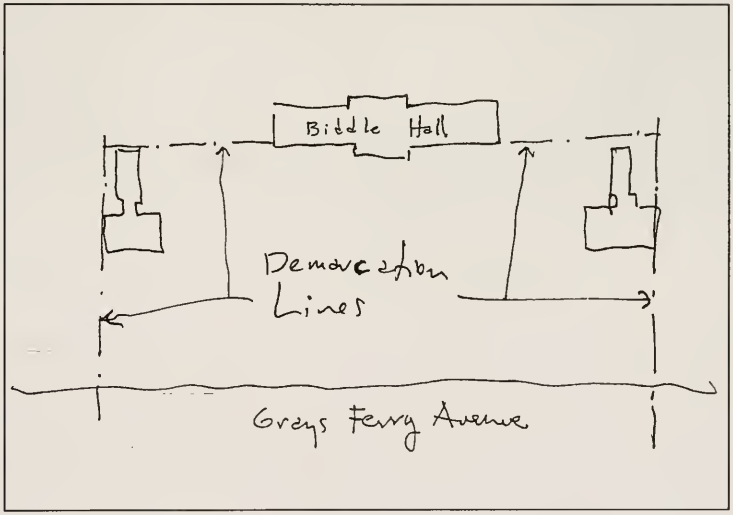

Figure 39 Diagram by Preservation Alliance marking the area where new construction was prohibited.

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[227] Ibid.
[228] Don Meginley to Andrew Terhune, June 16, 1997, Naval Home File, Preservation Alliance for Greater Philadelphia, Philadelphia, PA.
[229] Ibid.

In July 1997 Toll Brothers presented a revised plan to Herbert Vederman, then Deputy Mayor for Economic Development, Wayne Spilove, then Chairman of the PHC, and Richard Snowden, then Chairman of the Board of the Preservation Alliance.[230] That plan incorporated the Alliance's recommendations. **(Figure 40)**

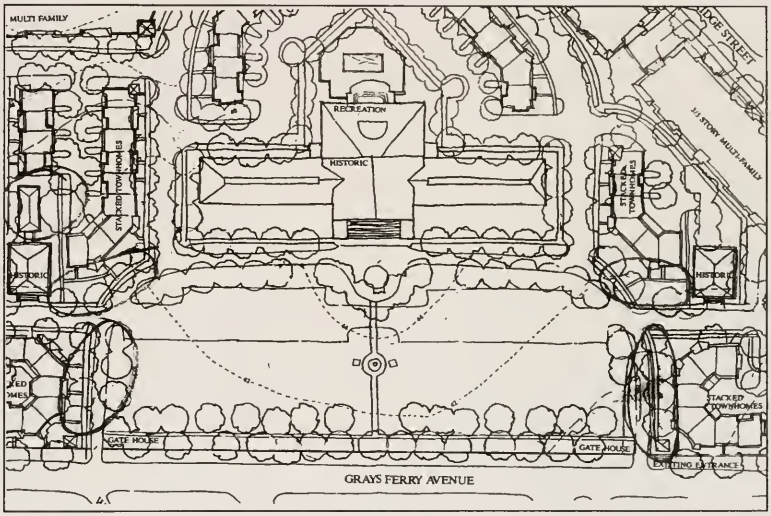

Figure 40 Revised plan submitted by Toll Brothers on July 9, 1997.

The design retained the Surgeon General's Residence in it its entirety; the duplex townhouses adjacent to the north and south gatehouses were pulled back on either side; and one duplex townhouse was removed from the buildings next to the two dependencies so that the ensembles did not crowd the historic houses. In addition, by moving the townhouses adjacent to the two dependencies, the public would enjoy a wider view from

[230] Andrew Terhune to Herbert Vederman, Wayne Spilove, Richard Snowden, July 9, 1997, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

Grays Ferry Avenue.[231] Terhune led Toll Brothers' efforts to move this plan through the approval process, but as with Toll's previous plans, the SHPO and the ACHP found that the siting of the new housing units intruded into the space that defined Strickland's original composition.[232]

In November 1997 Toll Brothers and the ACHP discussed modifying the existing covenants placed on the property. The ACHP's concern focused on the future use and treatment of Biddle Hall, the Governor's Residence, and the Surgeon General's Residence and the potential impact redevelopment would have on those buildings. The Council believed the existing covenant language lacked adequate provisions to protect, preserve, and rehabilitate the setting of the three Strickland buildings before the buildings deteriorated by neglect.[233] In a letter to Terhune, Don Klima, Director of the Office of Planning and Review with the ACHP, provided the Council's and the SHPO's recommended amendments to the covenants. These covenants incorporated "basic design principles for the front of the U.S. Naval Home site and more explicit language regarding the preservation and protection of the three NHL buildings."[234] The proposed revisions to the covenants outlined specific design guidelines, provided for the stabilization and eventual rehabilitation of the three Strickland buildings, and provided a system for resolving disputes that arose as the SHPO reviewed any plans or specifications. **(Appendix D)** Klima asked Toll Brothers to provide a written response to

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[231] Ibid.
[232] Bonnie Wilkinson Mark to Andrew Terhune, October 20, 1997, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[233] Don Klima to Andrew Terhune, November 4, 1997, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[234] Ibid.

the proposed revisions, but Toll Brothers did not respond, and instead asked to move to the plan approval process.[235] Klima's response to Toll Brothers asked for "adequate background documentation that provides the basis of the proposed site plan."[236] Klima also stated that in order to provide the background documentation, Toll Brothers address ten questions. **(Appendix D)** Among the questions Klima listed were the following: what was Toll Brothers' response to the Council's proposed amendments to the existing covenant; what factors did Toll Brothers consider in developing the proposed site plan, i.e. market demand, topography of the site, zoning, financing, etc; did Toll Brothers consult with the PHC in selecting the location of the new housing; and did Toll Brothers reach any agreements with preservationists following the extensive discussions with the Pennsylvania SHPO and the Preservation Alliance for Greater Philadelphia. Klima expressed his agency's dissatisfaction with the events of the past twelve years:

> Our last formal contact with Toll Brothers regarding the reuse of the U.S. Naval Home was in December 1985. We were quite disappointed to learn that no action was taken to implement the plan during the past decade and that the National Historic Landmark Buildings had been left vacant with minimal stabilization activities. It is, therefore, important that we ...receive adequate background information, as well as some degree of commitment from the property owner regarding the viability of proposed redevelopment activities before we approve yet another site plan.[237]

Toll Brothers responded to these issues in a letter on December 5, 1997.[238]

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[235] Andrew Terhune to Charlene Dwin Vaughn and Brent Glass, November 14, 1997, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[236] Donald Klima to Andrew Terhune, November 26, 1997, Naval Home File, PA Bureau for Historic Preservation, Harrisburg, PA.
[237] Ibid.
[238] Though no letter from December 5, 1997 was found, in a letter from Don Kilma to Zvi Barzilay dated March 24, 1998, Klima discussed such letter.

In March 1998, the ACHP granted approval for a zoning plan, dated November 13, 1997, and the development plan by Lessard & Associates dated November 11, 1997.[239] This approval was subject to the four following conditions:

> 1. By no later than January 31, 2000, Toll Brothers will advise the Pennsylvania SHPO and the Council of its reuse strategy for Biddle Hall, the Governor's House, and the Surgeon General's House. Should Toll Brothers be unable to meet this deadline, it will contact the Council at least three months prior to request an extension and to summarize the status of project planning.
>
> 2. Toll Brothers will take appropriate measures to ensure that Biddle Hall, the Governor's House, and the Surgeon General's House are preserved, stabilized, and protected, particularly during site preparation and new construction activities.
>
> 3. As part of the local administrative review process, Toll Brothers will explore the feasibility of eliminating the surface parking area proposed for the front of Biddle Hall or, at a minimum, reducing, to the maximum extant feasible, the number of parking spaces.
>
> 4. Schematic designs and preliminary and final plans and specifications for construction in zoning categories A1 and D, the area adjacent to the NHL Buildings, shall be submitted to the Pennsylvania SHPO for review and comment. Should the Pennsylvania SHPO object to any of the documents, the Pennsylvania SHPO and Toll Brothers shall consult further to reach a compromise solution. If the Pennsylvania SHPO and Toll Brothers are unable to reach a compromise, Toll Brothers shall submit the plans and specifications to the Council for its recommendations.[240]

Prior to this approval, in January 1998, Toll Brothers received approval for the same zoning plan (November 13, 1997) from the Pennsylvania SHPO.[241]

Concurrent with these approvals in 1998, Richard Tyler and Brenda Barrett expressed concern that the conditions of the three Strickland buildings had worsened and

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[239] Donald Klima to Zvi Barzilay, March 24, 1998, Naval Home File, PA Bureau for Historic Preservation, Harrisburg, PA.
[240] Donald Klima to Zvi Barzilay, March 24, 1998, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

requested a site visit. On March 5, 1998, there was a site visit attended by Andrew Terhune, Brenda Barrett, Bonnie Wilkinson Mark, and Richard Tyler. Also in attendance were Christine Piazza, intern from the Pennsylvania Bureau for Historic Preservation, Samuel Harris, architect and engineer of Kiernan, Timberlake & Harris, a Philadelphia architectural firm, and Liz Harvey, Historic Preservation Planner from the PHC.[242] Samuel Harris assessed the structural stability of the three Strickland buildings and made several recommendations for their immediate stabilization.[243] Of the three structures, the Governor's House was in the worst condition as moisture was present throughout the structure. Hyphae fungi grew on the water-soaked beams, several joists had failed, and others were in danger of failing. In addition in the front of the northern and southern parlors, the weight of the second floor hearths had punctured the first floor ceiling, which had no apparent structural support and was in danger of collapsing. Though Harris was unable to enter the Surgeon General's Residence, he determined by walking on the roof that the interior damage in this structure was not as severe as that in the Governor's Residence. Harris recommended clearing all the gutters and leaders of the Surgeon General's Residence. In addition, Harris's general recommendation for all three structures was to reactivate perimeter drainage in order to redirect water away from the buildings.[244]

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[241] Brent Glass to Andrew Terhune, January 5, 1998, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[242] "The Report of the Meeting Concerning the Structural Stability of the United States Naval Home," March 5, 1998, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[243] "The Report of the Meeting Concerning the Structural Stability of the United States Naval Home," March 5, 1998, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[244] Ibid.

Though Toll Brothers had approval from the SHPO, the PHC, and the ACHP, ultimately the Lessard & Associates plan was abandoned, as Toll Brothers "discovered that Philadelphia's high building cost (higher than either Washington or Baltimore and behind only Boston and the New York region on the East Coast) also precluded mid-rise construction."[245] In September 1999 in a meeting with Brent Glass, Brenda Barrett, Daniel Deibler, and Bonnie Wilkinson Mark, Andrew Terhune revealed Toll Brothers' new concept for the Naval Home. This new concept involved only low-rise structures, no taller than four stories. Toll Brothers also proposed an addition to Biddle Hall that would be three to four stories. The density of this proposal was equal to the last two proposals, 1,200 dwelling units. Terhune indicated that this plan reexamined the 1984 plan developed by WRT and Elliot Rothschild.[246] Developed in collaboration with Rogers, Taliaferro, Kostritsky, and Lamb (RTKL), an architectural firm headquartered in Baltimore, Maryland, Toll Brothers presented two diagrams of this conceptual plan to the ACHP and the SHPO in October 1999.[247] **(Figures 41 and 42)** This plan had a four-story multi-family building on the northeast corner of the site that was to have one hundred seventy units. There were two other four-story multi-family buildings shown along Banbridge Street. The other major feature of this plan was an addition to Biddle Hall that would contain between one hundred fifty to one hundred seventy units. The addition was to be attached at the rear of Biddle Hall at the point where the previous

[245] "History of the Naval Home," Toll Brothers description of the history of the Naval Home since the company became involved in 1982.
[246] Bonnie Wilkinson Mark, Meeting Notes from September 10, 1999, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[247] Andrew Terhune to Brenda Barrett and Charlene Dwin Vaughn, October 12, 1999, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation.

annex attached and at the fire stairways, non-historic features added in the 1950s. This addition would enclose the rear of Biddle Hall and create two courtyards. Similar to past proposals, this plan had provisions for townhouses adjacent to the dependencies and Biddle Hall. This plan showed a mixture of parking garages and surface parking lots, with one of the lots located in front of Biddle Hall. The plan called for implementation in phases. Phase one was to include the renovation of Biddle Hall, the Governor's and the Surgeon General's Residence. Terhune described the differences between Toll Brothers current plan and the Lessard & Associates plan:

> 1. The building at the Northeast corner which had been approved as a high-rise is now proposed to be a 4-story structure of roughly the same shape.
>
> 2. The town homes, previously to the West, and directly behind Biddle Hall, have been replaced by a building to be attached to Biddle Hall. This has been done to make better use of public spaces such as the rotunda available in Biddle Hall and to make them available to more of the residents.
>
> 3. The town homes to the North and South of Biddle Hall near the Surgeon and Governor's residences are remaining essentially unchanged.[248]

Terhune also requested that, as in the previous proposal, the State Historic Preservation Officer, Brent Glass, act for his agency as well as the ACHP.

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[248] Andrew Terhune to Brenda Barrett and Charlene Dwin Vaughn, October 12, 1999, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation.

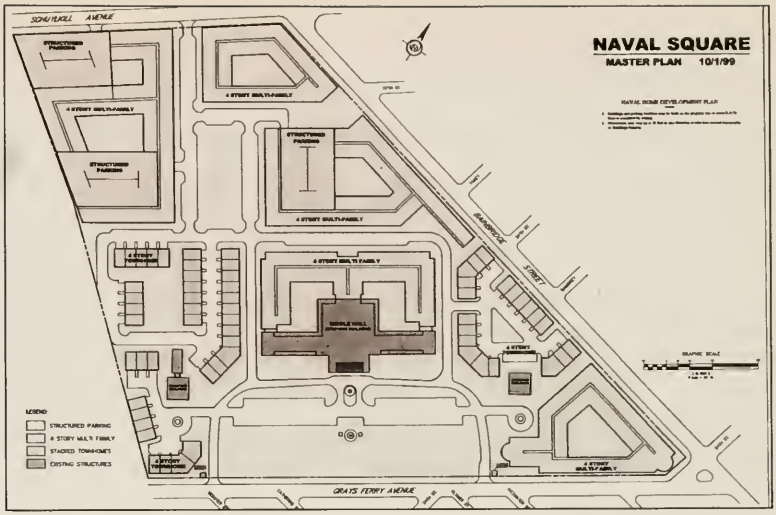

Figure 41 Final plan submitted called for an addition to Biddle Hall and low-rise structures along Banbridge Street, RTKL, October 1999.

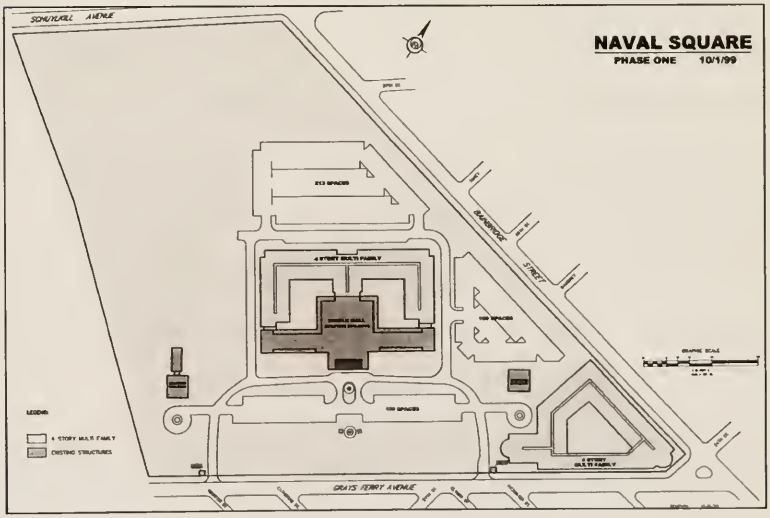

Figure 42 Phase one of the RTKL plan called for the construction of the addition to Biddle Hall, the rehabilitation of the two dependencies, and a new building on the corner of Banbridge Street and Grays Ferry Avenue.

On October 26, 1999, the Architectural Review Committee of the PHC met to consider Toll Brothers' new plan for the Naval Home and voted to recommend the plan to the Historical Commission.[249] The Preservation Alliance for Greater Philadelphia provided testimony at the October 26th meeting in support of Toll Brothers' plan,

> The revised concept presented to you today maintains the historic preservation provisions ...The removal of the high-rise towers from the previous conceptual plan improves the overall massing of structures on the site by maintaining a similar height for most of the structures. The removal of the curb cuts on Banbridge Street will allow for the preservation of the historic wall and maintain the original boundaries of the historic site. The proposed addition to Biddle Hall will allow for renewed use of the building in a sympathetic manner, by respecting the height and sightlines of this key building.[250]

On November 10, 1999, the PHC approved the conceptual plan upon the recommendation of the Architectural Committee.[251] In December 1999 Brent Glass informed Terhune that the SHPO and ACHP also approved the conceptual plan.[252] Glass also indicated that if Toll Brothers still planned to apply for the Federal Rehabilitation Tax Credit, the SHPO was available to provide assistance in the application process.

In January 2000 Bonnie Wilkinson Mark and Scott Doyle, also on the staff of the SHPO, visited the Naval Home site. The purpose of this site visit was to examine the grounds where the proposed new construction was to be built and to assess the condition

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[249] Andrew Terhune to Brent Glass and Charlene Dwin Vaughn, November 2, 1999, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[250] Ibid.
[251] Andrew Terhune to Brent Glass and Charlene Dwin Vaughn, November 12, 1999, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[252] Brent Glass to Andrew Terhune, December 8, 1999, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

of the two dependencies.[253] In addition, Robert Powers, an historic preservation consultant who worked with Toll Brothers, had informed the SHPO that someone was stealing the trim from the two dependencies. Photos taken by Bonnie Wilkinson Mark confirm that the trim was no longer in place.[254] It appeared that the trim was removed in order to salvage it. There was a bucket of blocks and door knobs in one corner. **(Figures 43 and 44)** Terhune recognized that Toll Brothers had to replace the trim.

Figure 43 Woodwork in Surgeon General's Residence, January 2000.

[253] Bonnie Wilkinson Mark, Notes from January 11, 2000 site visit, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[254] Conversation with Bonnie Wilkinson Mark, February 5, 2002.

According to Wilkinson Mark the condition of Biddle Hall and the Surgeon General's Residence appeared to be the same. However, since the 1998 site visit, the Governor's Residence showed further signs of deterioration. Though Toll Brothers had placed structural supports in the basement (suggested by Samuel Harris), the supports needed to be cross braced for additional support. In addition, the second floor had collapsed into one half of the rear addition.[255]

Figure 44 Arched trim in Surgeon General's Residence, January 2000.

During this site visit, Bonnie Wilkinson Mark encouraged Toll Brothers to investigate the possibility of using the six story garage at the corner of Banbridge and 24th Street to provide parking facilities. The Graduate Hospital owns the garage, but at the time only used one hundred twenty-five spaces of the four hundred available. Her

[255] Ibid.

thought was that using this garage would eliminate the need for a parking lot on the parade grounds in front of Biddle Hall.[256]

In February 2000 Andrew Terhune informed the SHPO that the NPS had a negative reaction to Toll Brothers' new proposal.[257] Toll Brothers moved ahead with its plans and submitted drawings of the proposed elevations to the PHC and requested they be placed on the Architectural Committee's agenda for February 29th.[258] **(Figure 45, 46, and 47)** At the meeting, the Architectural Committee voted to recommend approval to the Historical Commission provided Toll Brothers met the following conditions:

1. Recessed the north and south elevations three feet.
2. The new addition did not break the eave line of Biddle Hall.
3. Created a symmetrical west (rear) elevation.
4. Used stucco for the finishing material.
5. Established an order from base to eave for the bay windows on the addition.
6. Investigated the use of a base or rusticated base for the building.
7. Used the arched courtyard openings in a more ordered way.[259]

While discussions with the PHC were in process, Toll Brothers was also in negotiations with the SHPO.

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[256] Bonnie Wilkinson Mark, Notes from January 11, 2000 Site Visit, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[257] Brent Glass to Brenda Barrett and Bonnie Wilkinson Mark, February 11, 2000, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[258] Andrew Terhune to Randall Baron, February 15, 2000, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[259] "Meeting of the Architectural Committee of the Philadelphia Historical Commission," February 29, 2000, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

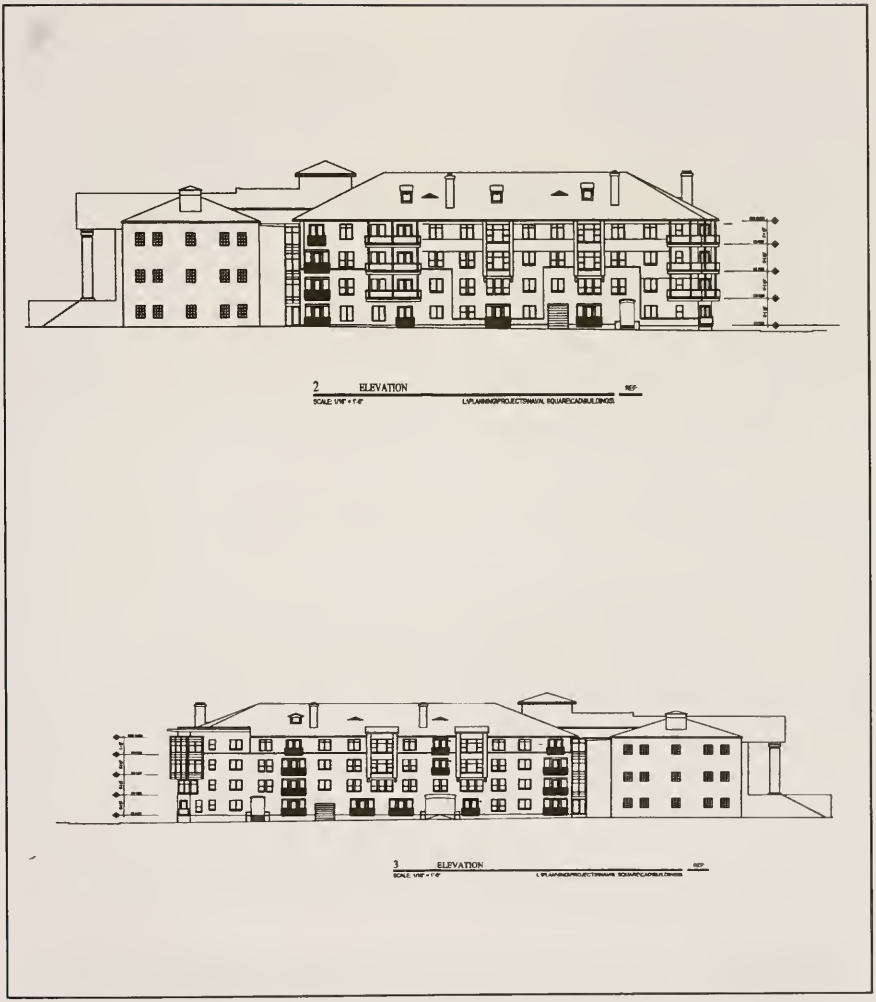

Figure 45 North and South Elevations of Biddle Hall submitted to Philadelphia Historical Commission, February 2000.

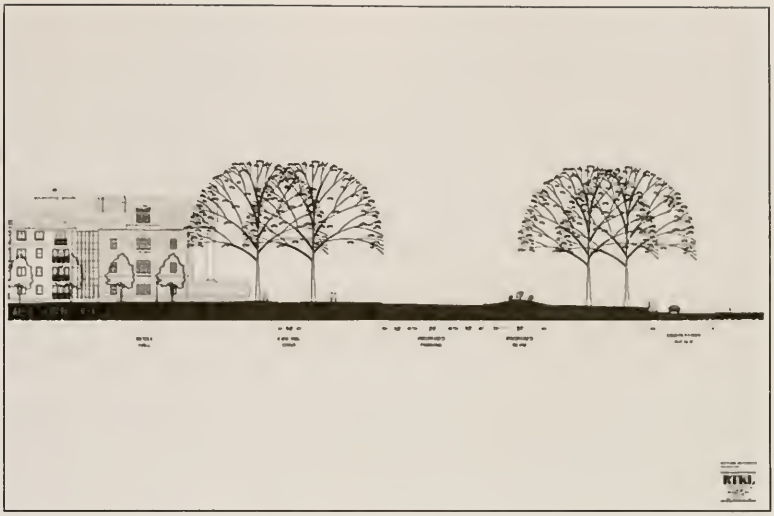

Figure 46 Elevation highlighting site lines from Grays Ferry Avenue, February 2000.

Figure 47 West elevation (top) and north and south elevations (bottom) of Biddle Hall with proposed new addition.

On April 19, 2000, the SHPO received Toll Brothers Part 2 Rehabilitation Certification Application for the current proposal. On May 23, 2000, Dan Deibler informed Andrew Terhune that Toll Brothers' application did not meet the Secretary of the Interior's *Standards and Guidelines for Rehabilitation* "because of the serious effects to the spatial relationship of the three historic buildings and a lack of information that does not allow a better understanding of the effects that the new construction will have on Biddle Hall. And finally there is no documentation provided to justify the demolition of the rear wing of the Governor's Residence."[260] Deibler specified how the plans Toll Brothers submitted were unacceptable. The interjection of the four-story building in front of the Governor's residence violated the spatial relationship between Biddle Hall and the two dependencies. Deibler reminded Toll Brothers that any new building was to be kept behind the front elevations of the Governor's and Surgeon General's Residences and the rear façade of the north and south wings of Biddle Hall. The SHPO also had concerns regarding the design of the addition. Similarly, the SHPO recommended the massing of the addition be recessed at least two feet behind the plane of the wings of Biddle Hall. In addition, there was no architectural reference in the addition to Strickland's design. The plans for the addition also lacked sufficient information to determine how the new building connected to Biddle Hall both at the roof line and at the stair towers. Deibler stated that Toll Brothers had to submit a structural engineer's report to substantiate the demolition of the rear wing of the Governor's residence. For these

[260] Daniel Deibler to Andrew Terhune, May 23, 2000, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

reasons, Deibler informed Terhune that the SHPO would not be comfortable forwarding the application to the NPS because "we would recommend denial (1) for lack of information and (2) for proposing to add new buildings into the landscape where they were specifically excluded in the previous (1984) proposal."[261] In spite of the SHPO's comments, Terhune asked the SHPO to forward the application to the NPS for their review.[262]

On May 31, 2000, Bonnie Wilkinson Mark forwarded the Part 2 application from Toll Brothers to the NPS. Her recommendation was that the application did not meet Standard One and Standard Nine of the Secretary of the Interior's *Standards for Rehabilitation* and also lacked information and therefore should be denied.[263] **(Appendix D)** Standard One states, "A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment." Standard Nine states, "New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment."[264] In the SHPO's view Toll Brothers' project did not meet this requirement because the proposed plan did not preserve the spatial relationship between the three Strickland buildings. This was not a new requirement because in

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[261] Ibid.
[262] Andrew Terhune to Daniel Deibler, May 24, 2000, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[263] Bonnie Wilkinson Mark, *State Historic Preservation Office Review & Recommendation Sheet*, May 31, 2000, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[264] Secretary of the Interior, *Standards for Rehabilitation*, 36 CFR Part 67.

August 1984, when the NPS granted approval, Toll Brothers submitted an application that respected this relationship. The second problem identified was that the lack of information regarding the new addition did not enable the SHPO to determine what the effect of such an addition would have on Biddle Hall. This violated Standard Nine that requires that additions and new construction be compatible with the massing, size and scale of a property and its environment. Also Toll Brothers did not submit sufficient information on the design of the remainder of the site or how each stage would be phased.[265] Andrew Terhune explained that though the SHPO review was negative, Toll Brothers wanted to submit this application to the NPS for feedback prior to moving forward with the design details.[266]

In June 2000 Sharon Park, Chief of the Technical Preservation division of the NPS, informed Toll Brothers that its application did not meet Standards One, Two, Five, and Nine of the Secretary of the Interior's *Standards for Rehabilitation*.[267] **(Appendix D)** Park referred to the 1985 plan where the NPS did grant conditional approval for the proposed rehabilitation of the buildings and site met the Standards. In addition Park highlighted the differences between the 1985 plan and the current proposal. Park stated:

> As shown on the 1985 site plan, proposed new construction consisted of buildings placed individually throughout the site. The new buildings were sited so as to be distinctly separated from and not impede views of the historic buildings. ...
> In the revised rehabilitation proposal, the new construction has become massive multi-family structures and groupings of connected townhouses rather than

[265] Bonnie Wilkinson Mark, *State Historic Preservation Office Review & Recommendation Sheet*, May 31, 2000, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[266] Interview with Andrew Terhune, October 16, 2001.
[267] Sharon Park to Andrew Terhune, June 26, 2000, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

> individual structures within the site. The new construction appears to be at least twice as dense as the original proposal…
> The size, scale and density of this new construction violates Standards 1 and 9. It destroys the spatial relationships among these historic buildings, impinges on the view of Biddle Hall from Grays Ferry Avenue and forecloses the historic views of the building group from all vantage points. The individual placement of the buildings in the 1985 plan understated the size and density of the new construction while preserving some open space within the site. The solid groupings of buildings in the 2000 plan emphasizes their mass and density and obliterates virtually all open space within the site.[268]

Park also stated that this requirement was not new, as over the past eighteen years the NPS consistently advised Toll Brothers that new construction will only meet the Standards if it is concentrated on the western half or rear of the site. Park further explained that the proposed multi-family building at the corner of Banbridge Street and Grays Ferry Avenue calls for the demolition of the existing perimeter wall and fence, character defining features of the site. This portion of the proposal violated Standards Two and Five which require that the historic character, materials and distinctive features of a property be preserved. The last major objection expressed by Park was that the demolition of the wing on the Governor's Residence violated Standard Two. Park also mentioned that due to a "substantial lack of information in the Part 2" the NPS could not determine if Toll Brothers proposal met the Standards. Park wrote, "Without a more comprehensive description of the overall rehabilitation, as required by program regulations, we cannot determine whether major components of the project meet the Standards."[269] Park informed Terhune that Toll Brothers could appeal this ruling by

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[268] Sharon Park to Andrew Terhune, June 26, 2000, , Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[269] Ibid.

writing to E. Blaine Cliver, Chief Appeals Officer, Culture Resources, National Park Service.

Toll Brothers appealed the June 26, 2000, decision immediately, and in November 2000 E. Blaine Cliver responded. **(Appendix D)** Cliver affirmed the denial by the Technical Preservation Service Branch as issued in June 2000. After meeting with Toll Brothers in September 2000, and reviewing the additional information provided by Toll Brothers in October 2000, Cliver concluded that the project did not meet Standards One, Two, Six, and Nine of the Secretary of the Interior's *Standards for Rehabilitation*.[270] Cliver described the history of the review process and the significance of the October 17, 1985, conditional approval. Of that approval Cliver wrote, "That approval ensured that the basic overriding historic character of this nationally significant property, established by the monumental front of Biddle Hall, by its relationship to the Governor's and Surgeon General's Houses, and by the expanse of open ground in front of these structures would be preserved."[271] Cliver explained that though the earlier project never took place, in 1999, when the NPS received a new application for the Naval Home, the NPS began its review with the conditions established by the 1985 approval. The new proposal did not resemble the previous plan, and the Technical Preservation Service Branch found the proposal did not meet the *Standards for Rehabilitation*. Cliver stated he agreed with the reasoning established in the 1985 review and reaffirmed in the June 26, 2000, decision. Cliver found that the proposed new construction did not meet Standards One, Two, and

[270] E. Blaine Cliver to Andrew Terhune, November 28, 2000, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[271] E. Blaine Cliver to Andrew Terhune, November 28, 2000, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

Nine. In addition, he found that the demolition of the rear wing of the Governor's House failed to meet Standard Two and Six. Cliver's main objection was to the buildings proposed between Biddle Hall and the Governor's and Surgeon General's Residences, to the row of townhouses at the southern corner of the site, and to the wing of the new building at the corner of Banbridge Street and Grays Ferry Avenue that projected in front of the Governor's Residence. **(Figure 48)**

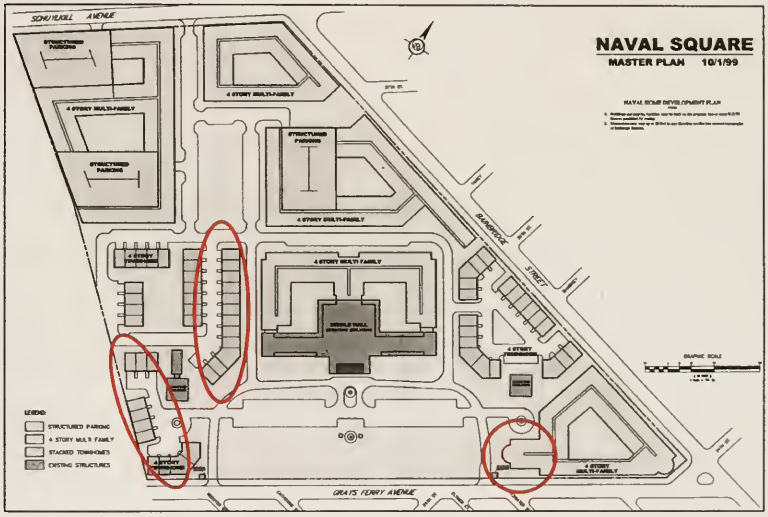

Figure 48 Highlighted areas indicate E. Blaine Cliver's objections to the 1999 proposal.

Cliver stated, "These proposed new elements would fail to preserve the key components of the historic character of the property identified in previous reviews."[272] On one point regarding the new proposal Cliver disagreed with the Technical Preservation Service Branch. Cliver stated the addition to Biddle Hall would not diminish the character of the

[272] E. Blaine Cliver to Andrew Terhune, November 28, 2000, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

building for the following reasons: the addition was sited at the rear and met Biddle Hall where a previous wing once connected; the addition would not have been visible from the front and it did not reorient the building.

Though Cliver did not reverse the earlier denial, he thought a proposal could be approved provided several conditions were met. To receive approval Cliver stated Toll Brothers had to remove the proposed new construction between Biddle Hall and the two dependencies as well as the row of townhouses at the southern corner of the site. The building proposed for the corner of Banbridge Street and Grays Ferry Avenue could be constructed if Toll Brothers modified its design and removed the portion that projected in front of the Governor's Residence. The rear wing of the Governor's Residence and the perimeter wall would also have to be retained. Cliver further explained that the material presented left many questions unanswered and in order to receive approval, specifications pertaining to the materials, color, design, and height of the addition needed to be submitted. In addition Cliver stated "...any plan for work on Biddle Hall and the other structures must also satisfy the 'conditions and understandings' set forth in the October 17, 1985, letter culminating several years' worth of National Park Service review and negotiations regarding these buildings."[273] These previous discussions, as mentioned in this chapter, particularly involved the location of parking spaces in front of Biddle Hall. Cliver indicated that the original agreements Toll Brothers reached with the NPS had to be honored. Finally, Cliver stated that if Toll Brothers chose to modify the project to meet the requirements he outlined, the new proposal should first be submitted to the

[273] E. Blaine Cliver to Andrew Terhune, November 28, 2000, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

SHPO. As the project stood, however, it did not qualify for the Federal income tax credit for historic preservation.[274] Cliver's decision was final -- Toll Brothers could not appeal his decision.

Subsequently, there was a series of telephone conference calls between the SHPO and Toll Brothers.[275] The first of these took place in December 2000. Zvi Barzilay explained that from Toll Brothers' perspective the approval process had been too complicated and as a result no project may ever be built on the site. Barzilay also commented that Toll Brothers had economic requirements that the SHPO did not understand.[276] Brent Glass responded that for over twenty-five years the SHPO worked with Toll Brothers to create an acceptable proposal. Glass also reminded Barzilay that Pennsylvania led the nation in historic rehabilitation. In June 2001 the National Park Service reported that over a five year span, Pennsylvania was second in the nation following New York in historic rehabilitation.[277] From 1995 to 2000 Pennsylvania had two-hundred seventeen rehabilitation projects totaling $441,686,218 in private investment.[278] The SHPO recommended Toll Brothers examine successful rehabilitation projects recently completed in Philadelphia.[279] Following this conference call there were

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[274] E. Blaine Cliver to Andrew Terhune, November 28, 2000, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[275] Conversation with Bonnie Wilkinson Mark, February 5, 2002.
[276] Bonnie Wilkinson Mark, Notes from Conference Call, December 20, 2000, Naval Home File, PA Historic and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.
[277] "Top Ten States Ranked by Certified Expenses Over 5-Year Span," *Federal Tax Incentives for Rehabilitating Historic Buildings*, U.S. Department of the Interior, National Park Service, June 2001.
[278] Ibid.
[279] The SHPO referred Toll Brothers to the recent rehabilitation of the Philadelphia Savings Fund Society Building designed by George Howe and William Lescaze from 1929 to 1932. A private developer purchased the building and converted it to a hotel from 1998 to 2000. There was a complementary addition to the rear of the original structure and this is the reason SHPO referred Toll Brothers to the project.

two others in 2001.[280] However, these efforts did not lead to another proposal. Before a scheduled fourth conference call was held, Toll Brothers cancelled and the SHPO has not heard from the company since that cancellation.[281] While there has been speculation on the part of the ACHP that Toll Brothers currently wants to sell the site,[282] Toll Brothers did not confirm this information.

[280] Conversation with Bonnie Wilkinson Mark, February 5, 2002.
[281] Ibid.
[282] Phone Conversation with Charlene Dwin-Vaughn, January 31, 2002.

Chapter 4: The Future of the Naval Home

Thus far this thesis has addressed the history of the Naval Home, the organizations involved in its reuse, and the past proposals advanced by Toll Brothers and their respective outcomes. Through this analysis, I have clarified the events of the past twenty years and highlighted the complications surrounding the approval process. This chapter will provide suggestions to improve this process.

This chapter will also demonstrate that though Toll Brothers has not found an acceptable reuse scheme, the site, along with the three Strickland buildings, presents a prime opportunity for residential development. Residential developments adjacent to the Naval Home by two different realtors illustrate that today's real estate market will support new construction in that location. Whether Toll Brothers or another developer succeeds in the rehabilitation and redevelopment of the site, a viable solution must be found to ensure the preservation of this National Historic Landmark.

Approval Process

The approval process was a hindrance to the Naval Home's rehabilitation and redevelopment. Though the covenants adopted in 1982 made an attempt to protect the historic features of the site and guide new development, they did not clearly establish a procedure for Toll Brothers or the preservation organizations to follow. The result was a complicated and disjointed sequence of events with which all the parties involved expressed frustration. The confusion left Toll Brothers to fumble through the process and in the end the site suffered. At this point, there is an opportunity to define a guide for the

approval procedure and thus increase the probability of creating an acceptable development plan.

A reference guide to the approval process will only be successful if two other changes are taken into consideration. First, Toll Brothers should recognize that its strength, based on the company's past experience, is the planning and development of new housing and therefore it would be prudent for Toll Brothers to hire a preservation consultant. Preferably this individual or organization will have experience with and knowledge of the redevelopment of complicated historic sites such as the Naval Home. Toll Brothers can only stand to benefit from capitalizing on the knowledge of a preservation consultant. The consultant can become a facilitator or mediator between Toll Brothers and the historic preservation organizations. In addition, before any work can continue change is also required on the part of the preservation agencies. The SHPO, ACHP, NPS, and the PHC need to assign one or two representatives to oversee the Naval Home site. As the past twenty years have shown, four agencies was a burden to the developer and contributed to the confusion. Possibly the SHPO and the NPS can work together as the primary reviewers of the project and the ACHP can be called upon at times when disputes arise between the SHPO, NPS, and Toll Brothers. While it would be preferable to reduce the number of preservation agencies to one, in order for Toll Brothers to receive federal tax credits, the NPS, as the administrator of the tax program, needs to remain involved. The role of the PHC can be eliminated or limited to a minimum amount of involvement as the SHPO can assume responsibility for the

Commission's tasks. These two modifications, along with a clarified approval process, might lead to a successful rehabilitation and development program for the Naval Home.

In order to redefine the approval process, it is important to review the definition of site planning. Gary Hack and Kevin Lynch in their book Site Planning define site planning as "the art of arranging structures on the land and shaping the spaces between, an art linked to architecture, engineering, landscape architecture, and city planning."[283] The authors continue that the aim of site planning is both moral and esthetic. The eight stages of site planning as defined by Hack and Lynch follow: define the problem, determine the program, analyze the site and its user(s), create a schematic design and a preliminary cost estimate, develop the design and a detailed cost estimate, write contract documents, the bidding and contracting process, construction, and occupation and management. Though this description appears to be a linear process, it is actually a cyclical process as later phases influence earlier ones and decisions are reworked. The advantage to the stages described by Hack and Lynch is that they are easily adaptable to unique sites such as the Naval Home.

I grouped the planning stages described by Hack and Lynch into four phases that can be applied to the Naval Home: analysis, schematic design, design development, and implementation. **(Figure 49a-49c)** Before advancing from one phase to another approval is necessary. A brief description of each phase follows.

Phase one requires a detailed site analysis that will be used in conjunction with design guidelines to determine the developable areas on the site. In the case of the Naval

[283] Gary Hack and Kevin Lynch, Site Planning, Third Edition (Cambridge, Massachusetts: The MIT Press, 1984), 1.

Home, rather than attempting to analyze all the issues involved, it is better to first identify those issues that have the most impact on the site. A SWOT analysis provides a framework for identifying these crucial issues. A SWOT analysis identifies the strengths, weaknesses, opportunities, and threats or constraints of a site.[284] While strengths and weaknesses are internal to a site, the opportunities and constraints are a reflection of external factors that impact the site. This initial analysis is very important, as it will be used to create a preservation and development strategy to guide all future work on the site. Along with a SWOT analysis, phase one requires a stabilization and maintenance plan for the historic structures and a statement clarifying the company's objectives. An initial cost estimate is also included in this preliminary process. The goal of phase one is to determine the developable areas on the site. Two documents shall be required at the end of phase one - a stabilization plan for the three historic structures and a diagram indicating the developable areas with the approximate square footage of each area. These documents are to be submitted to the SHPO for review. If the SHPO approves the documents submitted, Toll Brothers would continue to phase two and define the program for the site and begin to develop a schematic design. However, if the SHPO raises objections, the plans would be forwarded to the ACHP for their review and comment. The ACHP, within a period of thirty days would either concur with the SHPO or recommend modifications so that Toll Brothers could resubmit the plan. Approval from phase one would be necessary for Toll Brothers to proceed further.

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[284] SWOT was originally designed as an analytic tool as a means to evaluate businesses, but the technique can also be applied to a physical site.

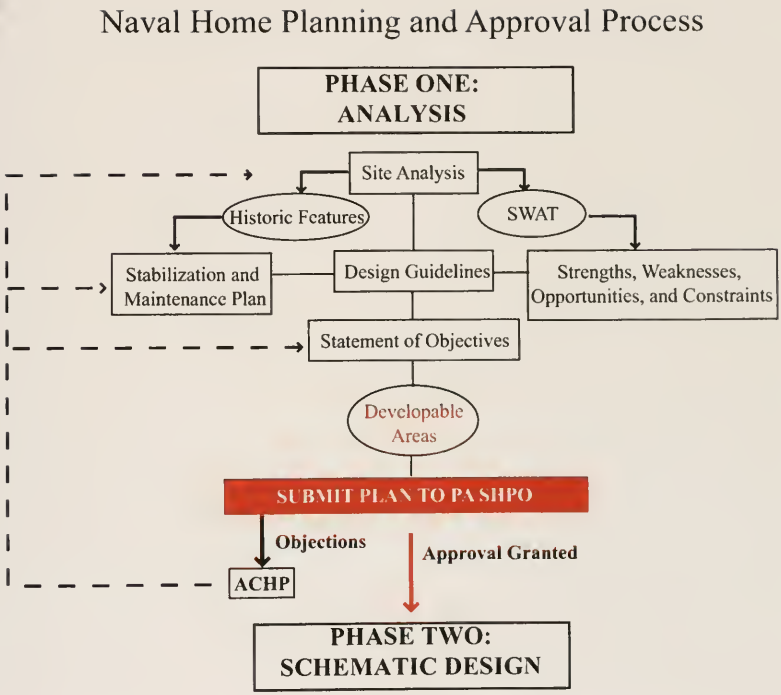

Figure 49a Phase One, Naval Home Planning and Approval Process.

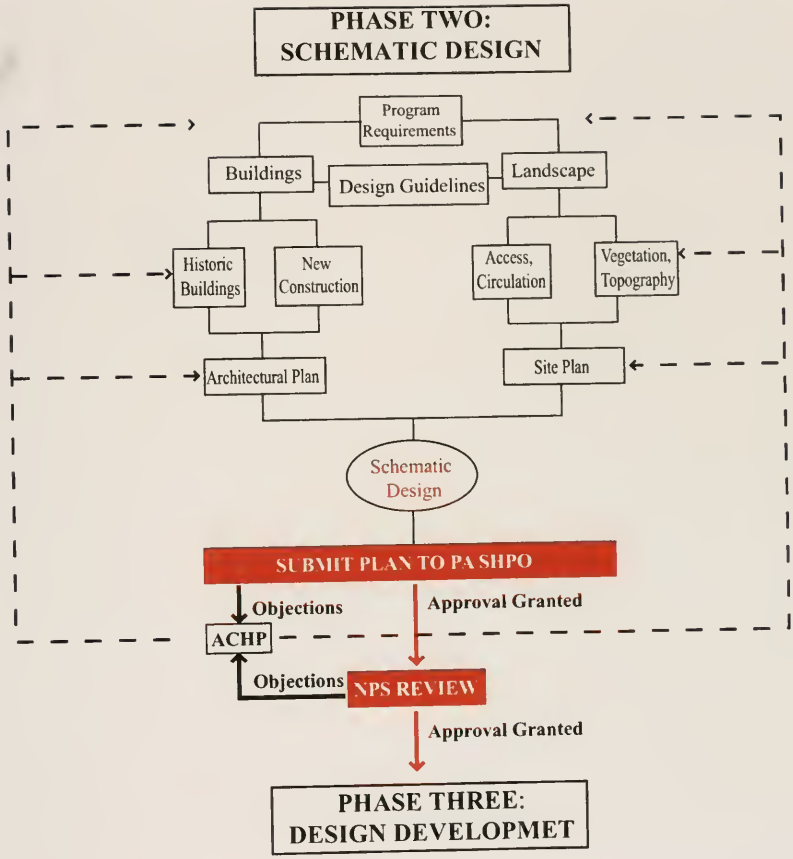

Figure 49b Phase Two, Naval Home Planning and Approval Process.

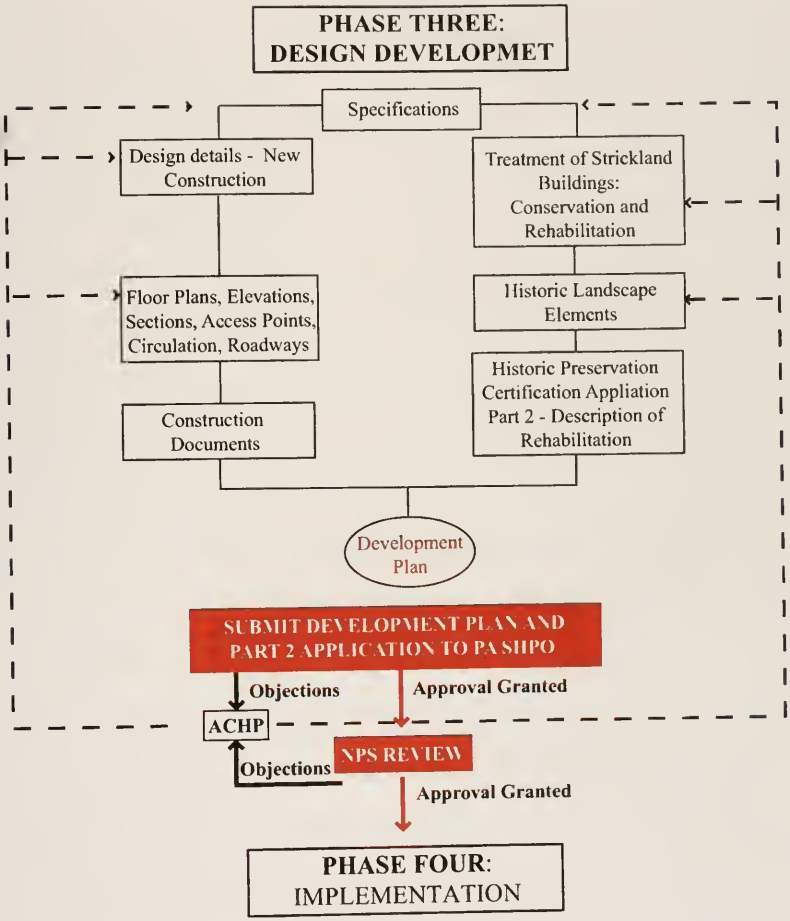

Figure 49c Phase Three, Naval Home Planning and Approval Process.

The main effort of phase two is to refine the development program described in phase one and create a schematic design that can be presented to the SHPO and NPS. This phase is divided into two so that an architectural plan for the buildings will be developed concurrently with a site plan that considers the landscape of the site. Together these two plans will be combined and presented as the schematic design.

The architectural component in a project of this type will probably be done over the course of several years in different stages. Before any new construction will be permitted on the site, the rehabilitation of Biddle Hall and the two dependencies must begin. New construction may be developed concurrently; however the priority during the first stage should be to stabilize the Strickland buildings so rehabilitation work can begin immediately. It is probable that no development plan will be approved if this is not the scenario. Therefore, Toll Brothers will have to submit descriptions of the remaining stages and provide the following information: how each area will be developed, with what type of units (townhomes, low-rise, mid-rise, etc.), the height of the units along with their general mass and scale, and most importantly, how the new units will relate to the historic buildings. The relationship between the new construction and the existing structures was a major point of contention in the past. However, this conflict will be avoided as the site analysis should identify the non-developable areas of the site.

The landscape of the site is integral to the site's character and as significant as the three Strickland buildings. The landscape features especially worth noting are the front lawn designed by Strickland, the specimen trees, the perimeter brick wall, and the site's

topography. Over the past twenty years, the SHPO and the NPS repeatedly indicated that these elements are important to the site. Both the SHPO and NPS emphasized the importance of the front lawn and stated it was to remain as originally intended and free of parking. In order to determine what specific tress should be saved, a survey identifying their condition and significance should be undertaken. In addition, another key element of the site is the perimeter brick wall that also needs to be surveyed to determine its condition and how it should be treated in the future. While much of the wall remains intact, there are sections along Banbridge Street where the wall has been replaced with a chain link fence. The section of wall between the two gatehouses on Grays Ferry is capped by decorative ironwork that dates to the nineteenth century. Both the SHPO and NPS in the past twenty years identified the importance of the preservation of the wall and ironwork. Finally, the site's topography offers nice views of the surrounding neighborhoods, and this should be taken into consideration when placing and designing new individual dwelling units on the site. Along with the topography it appears that many of the original roads are intact and can serve as a guide to shape the development along the site. The third entrance along Schuylkill Avenue can possibly be reopened to introduce another vehicular access point to the site. A complete analysis of the landscape will help identify any issues (i.e., access, circulation, environmental) that may be problematic to the site's development. Once identified, the problems can be addressed in the site plan. Components of the site plan and architectural plan will provide the basis for the schematic design.

Once a schematic design is complete it will be presented to the SHPO. Similar to the approval process suggested for phase one, if the SHPO has any objections the plan will be forwarded to the ACHP for its review and comments. The ACHP would have a thirty day period to review the design and either concur with the SHPO or provide suggestions for Toll Brothers to incorporate and resubmit the design. If the SHPO approves the schematic design, it would be appropriate to submit the design to the NPS for their initial review and comment. If the NPS agrees with the SHPO that the plan is acceptable, Toll Brothers will begin phase three, design development. However, if the NPS disagrees with the SHPO, the NPS will be required to explain its objections and also submit the design to the ACHP for comments. In this way, the role of the ACHP will be defined to be similar to that of a court in reviewing an appeal in a legal suit. Conceptual approval from the NPS would be required before Toll Brothers could proceed to design development.

During the third phase of the approval process the schematic design will be refined into the final development plan. First, design details for the new construction will be specified through a series of architectural drawings. The end result of this work will be construction documents that can be submitted for final approval to the SHPO and NPS. Along with this work, the rehabilitation scheme for the three Strickland buildings will be detailed in a similar manner. Simultaneously, the Part 2 application for tax credits should be completed and submitted with the final development plan to the SHPO. The SHPO will review and comment on the design as well as the Part 2 application. Upon completing its review the SHPO will forward the application and its recommendation to

the NPS for final approval. Once the NPS approves the application, Toll Brothers would proceed to the final phase, implementation. The implementation of a complex project like the Naval Home will require management to ensure all work is carried out according to the specifications. In addition, it is highly recommended Toll Brothers draft a management plan so that upon completion, there is an established procedure for both short term and long term maintenance of the site.

Site Analysis

A new site analysis must be conducted to determine the potential for reuse and redevelopment of the Naval Home. In order to assess the site's potential and demonstrate the effectiveness of SWOT as an analytic tool, I conducted a site analysis of the Naval Home. My goal was to identify developable and non-developable areas within the site. My initial findings are discussed below.

The three Strickland buildings are character defining features of the site and are one of the site's greatest strengths. They provide a focal point for new development. The formal front lawn as designed by Strickland reinforces the composition and relationship between the buildings. Therefore, no new construction should be permitted in this area. Along with the existing historic features, the site's topography offers views of Center City and the surrounding neighborhoods. The steep slope along Banbridge Street may provide inspiration for an architect to design a solution so that homes can be built into the slope. However, this type of design may prove to be costly and prohibit this construction. In addition the landscape including the specimen trees are an important part of the site's composition.

The landscape also reflects the Naval Home's history and its preservation is as important as the preservation of the Strickland buildings. Another of the site's strengths is its considerable size of twenty acres. Though the front (east) portion of the site is occupied and off limits to new development, most of the land towards the rear (west) of the site is available and suitable for residential development.

The Naval Home site also presents weaknesses, some of which are the direct opposite of its strengths. For example, while the size of the site is large, its unusual trapezoidal shape is a weakness in that it is more difficult to configure new construction on the site. In addition, while the topography offers architects opportunities to create innovative design solutions, the resulting cost of such construction may prohibit its realization. Due to the poor condition of the three Strickland buildings, the cost of rehabilitation has been described as "excessive" by Toll Brothers.[285] This cost prohibits Toll Brothers and may prohibit another developer from executing the project. Another challenge of the site is that access is limited to the two entrances on Grays Ferry Avenue and one entrance on Schuylkill Avenue. There is a possibility that other entrances can be built along Banbridge Street at points where the perimeter wall no longer stands. For example, at the intersection of Banbridge Street and Schuylkill Avenue, a chain link fenced has replaced the original brick wall. **(Figure 50 and 51)** In addition, between Taney Street and 26th Street, there is another chain link fence between two breaks in the perimeter wall. Rebuilding the wall is not recommended. Instead, it may be possible to create terraced gardens and a pedestrian connection between the site and the residential neighborhood to the north.

Figure 50 View of the rear of the Naval Home site showing the break in the perimeter wall.

Figure 51 A chain link fence replaced the perimeter brick wall on Banbridge Street between Taney Street and 26th Street.

[285] Interview with Andrew Terhune, October 16, 2001.

Despite the weaknesses identified above, the Naval Home is an asset to the City of Philadelphia and its potential for residential development is a prime development opportunity. The location of the site is excellent as it is within one-quarter to one-half mile from Center City, the locus of residential and commercial activity in Philadelphia and University City, the educational center of the City. Two realtors, Prudential Fox & Roach and Coldwell Banker built new townhomes adjacent to the site within the last two years. **(Figures 52 and 53)** The Prudential development consists of three story townhomes with three bedrooms, two and a half baths, deck, patio, fireplace, and a two car garage. The list price of the homes built in phase two of the project is $475, 900 and includes a three year tax abatement.[286] Southbridge, the development by Coldwell Banker is also three story townhomes roughly 2,800 square feet with three to four bedrooms, three baths, a roof deck, and a garage. The list price of these homes is equal to $375,000 with a ten year tax abatement.[287] The price of the Coldwell Banker townhomes may suggest what new townhomes on the Naval Home site could potentially command as Southbridge is located directly north of the site at the intersection of Banbridge Street and 27th Street. Both of these realtors recognized that a central location between Center City and University City is a prime opportunity for residential development. The Naval Home is in an equally advantageous location to capitalize on the market.

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[286] "New Construction." Prudential Fox & Roach Realtors, available from http://www.foxroach.com; Internet, accessed 25 March 2002.
[287] "Buyer Property Search," Coldwell Banker, available from http://www.coldwellbanker.com; Internet, accessed 25 March 2002.

Figure 52 River Park Place Phase I. New townhomes constructed by Prudential Fox & Roach in the residential neighborhood to the north of the Naval Home.

Figure 53 Southbridge. New townhomes built by Coldwell Banker at the corner of Banbridge and 27th Streets.

Along with current residential development, two current planning studies identify the Naval Home as an opportunity. *A New Vision for the Tidal Schuylkill*, a plan developed as a collaborative effort by the Schuylkill River Development Council (SRDC), the Tidal Schuylkill Task Force (an alliance of thirty-five private and public stakeholders), and a professional planning team led by EDAW, Inc identifies the Naval Home and its future development as a potential force that could reinvigorate the river. **(Figure 54)** Along with the SRDC's plans, the University of Pennsylvania is also working to strengthen its relationship to Center City by expanding its campus toward the east. The University has plans to create improvements along the South Street Bridge and the future development of the Naval Home as a residential community might attract the university's staff and students.

The parties involved in the Naval Home including Toll Brothers and the preservation agencies are both an opportunity and a constraint to the site. While Toll Brothers brings capital to the site, their lack of experience with urban environments and historic preservation has limited the company's confidence relating to investment and action over the past twenty years. The site has not realized its full potential due to these constraints. In addition, while the preservation agencies served to protect the significance and architectural integrity of the Naval Home, the number of agencies and at times their lack of coordination hindered the site's redevelopment.

Figure 54 The Naval Home was one development opportunity identified by *The Tidal Schuylkill River Master Plan*.

Other constraints that hinder the site's development include the following three physical barriers: the energy plant operated by PECO Energy Company, the John F. Kennedy Vocational School, and the Graduate Hospital parking garage. **(Figures 55, 56, and 57)** The PECO energy plant creates an industrial barrier to the west that both reduces the site's attractiveness for residential development and prevents further expansion for new construction. The JFK building is six stories tall and blocks the view from the Naval Home to the river. In addition, access to the river is blocked by this massive building and the *CSX Lines, LLC* railroad tracks that run adjacent to the riverfront. The analysis done prior to *A New Vision for the Tidal Schuylkill* also identified the CSX railroads tracks as a physical barrier. **(Figure 58)** Another obstruction to the site is the four-story parking garage at Banbridge and 24th Streets. Owned by the *Graduate Hospital* located at 1800 Lombard Street, this garage is a barrier to the residential neighborhood north of the Naval Home. In addition the underused garage is reserved for employees of the hospital. In 2000, of the four hundred spaces available, the hospital used only one hundred twenty-five spaces.[288] Perhaps an agreement can be arranged between Toll Brothers and the hospital in which the developer leases the unused spaces. This would eliminate the need to build parking directly in front of Biddle Hall and thereby enable the preservation of a significant portion of the site.

[288] Bonnie Wilkinson Mark, Notes from January 11, 2000 Site Visit, Naval Home File, PA Historical and Museum Commission, Bureau for Historic Preservation, Harrisburg, PA.

Figure 55 The PECO Energy Plant creates an industrial barrier for residential development.

Figure 56 The John F. Kennedy Vocational School creates a barrier to the river.

Figure 57 The Graduate Hospital Parking Garage on the left sits directly to the north of the Naval Home site.

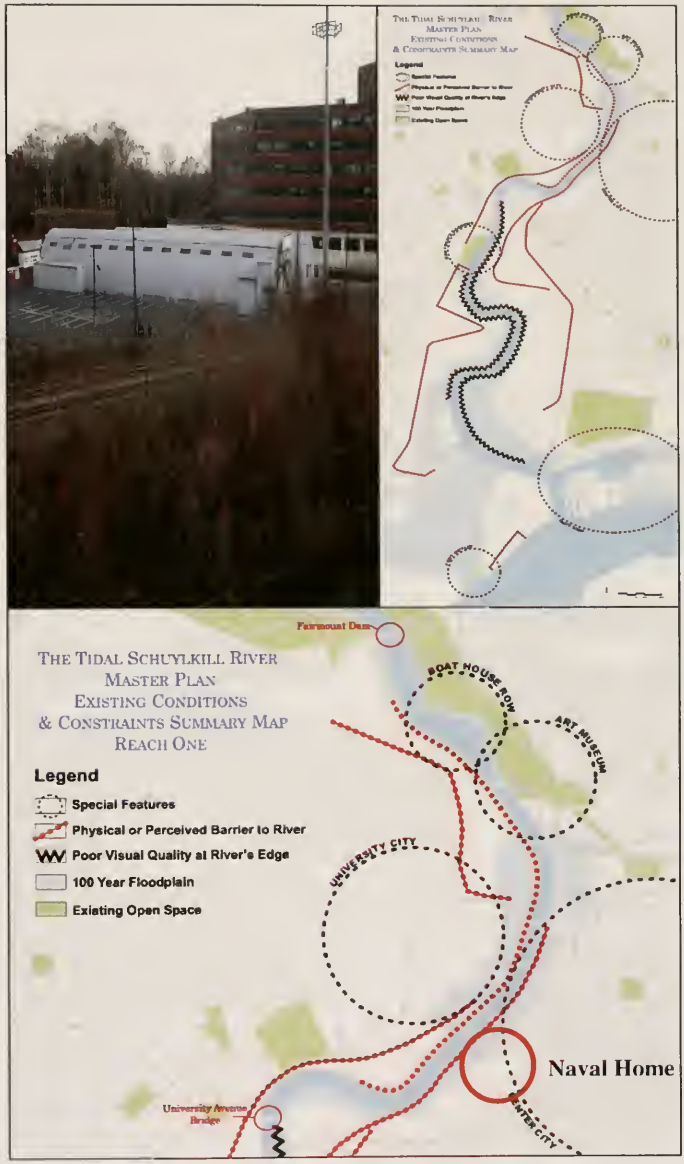


Figure 58 ***The Tidal Schuylkill River Master Plan*** **identified the CSX Railroad tracks as a constraint.**

I summarized the above analysis in a drawing that represents the strengths, weaknesses, opportunities, and constraints of the Naval Home. **(Figure 59)** From this summary, I discerned six developable areas of the site and one non-developable area, the front (east) portion of the site. Any new construction in this area would destroy the relationship between the three Strickland buildings and the character of the site. There appears to be ample space towards the rear (west) of the site to build new housing units. In addition, as construction is currently underway by Coldwell Banker, Toll Brothers may be able to capitalize on the market momentum of that development. Along with the SWOT, I estimated rough square footages of each area and recommended specific height limitations for new construction in each area. For example, in the areas closest to the historic features, the height limit of any new construction should not exceed three stories. The main objection of this guideline is to ensure that no new construction breaks the height established by the roof line of the existing structures. In contrast, the height limit for new development on the rear of the site is more flexible. A new building in these areas can be as tall as eight stories. Along with these height limitations, I suggested locations at which new access points may be introduced. For example, along Banbridge Street where the perimeter wall no longer stands, it may be possible to create a pedestrian entrance through a series of terraced gardens. On the basis of this site analysis I have shown that there is adequate space on the site for new construction without major intrusions on the existing Strickland buildings or their setting. Hopefully these recommendations will lead to a solution that will generate sufficient economic benefit to enable preservation of the Strickland buildings and provide a profit for the developer.

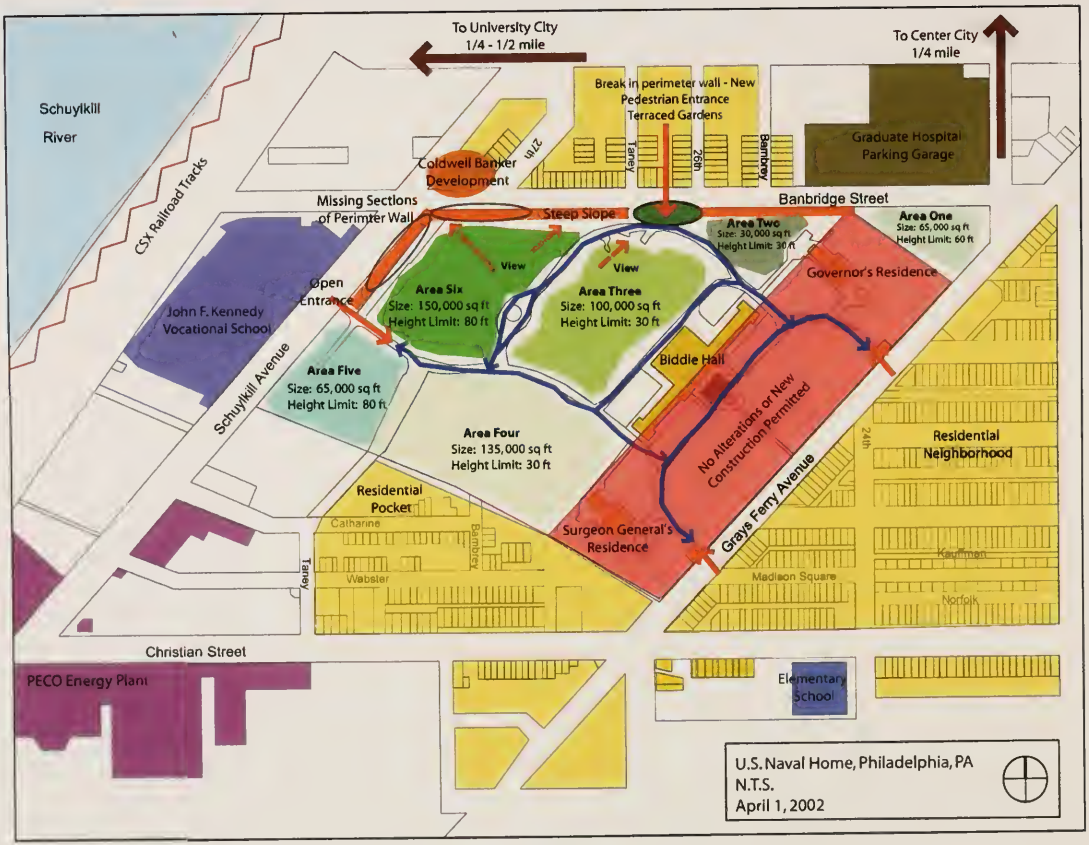


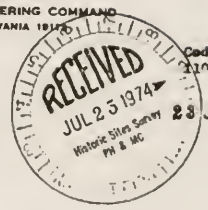
Figure 59 SWOT Analysis of the Naval Home.

The Naval Home site has the potential to be reused and redeveloped. A review of the proposals suggested over the past twenty years demonstrated that the approval process was complicated and time-consuming. The lack of a clear, cohesive process led Toll Brothers and the historic organizations into a series of misunderstandings and battles, over the course of which the condition of the buildings worsened and the cost of rehabilitation increased significantly. Further investigation into the financial constraints on the treatment and reuse of the historic structures is needed. This thesis has demonstrated that the internal strengths of the site, along with the opportunities that exist today, point in a positive direction toward finding a sensitive solution. It is my hope that this thesis will lead to a development plan that preserves the Naval Home site and ensures its vibrant future.

EA

DEPARTMENT OF THE NAVY
NORTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
PHILADELPHIA, PENNSYLVANIA 19112

TELEPHONE NO.
Area Code (215)
755-4845



Code 24103
11011/R

23 JUL 1974

United States Department of the Interior
National Park Service
Mid Atlantic Region
143 South Third Street
Philadelphia, Pennsylvania 19106

Attention: Mr. John W. Reed
Landmark and National Register Specialist

Re: U. S. Naval Home, 24th Street
and Grays Ferry Avenue,
Philadelphia, PA 19146

Gentlemen:

The Department of the Navy plans to relocate the Naval Home from the Philadelphia Area to Gulfport, Mississippi in the summer of 1976.

If no need for the property is disclosed within the Department of Defense, the Navy will report the Home to the General Services Administration for eventual disposal.

As the Naval Home is included in the National Register of Historic Places, I am taking this opportunity to give you advance notice of the proposed disposal action so that you may take the necessary steps to insure preservation of the historic and architectural aspects of the Home.

The Office of the Governor, U. S. Naval Home, Philadelphia, Pennsylvania, is aware that your Agency has historical and architectural responsibility for property in the National Register. If you desire direct liaison with the Home you may call Lieutenant Commander C. J. Thompson, Executive Officer to the Governor at 545-4783.

Very truly yours,

T. J. DOYLE
CAPT, CEC, USN
ACTING COMMANDING OFFICER

Copy to:
NAVHOME, PHILADELPHIA, PA
NAVFACENGCOMHQ (Code 205P)
NAVPERSPROGSUPPACT, WASHINGTON, DC
COMFOUR
PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION, HARRISBURG, PA

United States Department of the Interior
BUREAU OF OUTDOOR RECREATION
NORTHEAST REGIONAL OFFICE
Federal Building - Room 9310
600 ARCH STREET
Philadelphia, Pennsylvania 19106

IN REPLY REFER TO:
6100

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Historic Sites Survey
FH & MC

SEP 1 1976

Mr. A. Edward Simon
Executive Director
Office of State Planning
and Development
Room 503, Finance Building
P. O. Box 1323
Harrisburg, Pennsylvania 17120

Re: U.S. Naval Home
24th and Grays Ferry Avenue
Philadelphia, Pa.
(N-Pa-684) 20.53± acres

Dear Ed:

This is to inform you that the General Services Administration has reported as surplus to the U.S. Government the property identified above and described on the enclosed "Notice of Surplus Determination." The property is now available to States, counties and municipalities for acquisition for any of the purposes indicated.

Public Law 91-485 was signed on October 22, 1970 giving the Secretary of the Interior the authority to request from the General Services Administration the assignment of Federal surplus real property to the Department of the Interior for transfer to non-Federal public agencies for public park and recreation purposes at up to 100 percent discount. The Secretary has delegated his authority under P.L. 91-485 to the Director of the Bureau of Outdoor Recreation. Transfers are made in perpetuity for public park or recreation purposes and are subject to reversion of ownership to the United States if not used for the purposes for which they are obtained.

Assignments of surplus properties are limited to public agencies which can clearly show that the property is suitable for the proposed public park or recreation use and that there is an identifiable need for the proposed use. Land transferred shall not be in amounts greater than that which can be appropriately developed and maintained.

Agencies interested in acquiring the property listed on the enclosed notice should notify this office by September 10, 1976.

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OFFICE OF STATE PLANNING
AND DEVELOPMENT

AMERICAN REVOLUTION BICENTENNIAL 1776-1976

We also ask that the interested agency contact the General Services Administration (see the address within the attached surplus notice) by copy of their letter to us so that they are also aware of the expressed interest.

Upon receipt of an expression of public park or recreation interest, we will furnish the necessary forms and instructions for the preparation of a formal application.

Sincerely yours,

Edwin L. Shellenberger
Assistant Regional Director

Enclosures

Advisory Council On Historic Preservation

1522 K Street, NW
Washington, DC 20005

MEMORANDUM OF AGREEMENT

WHEREAS, the General Services Administration (GSA) proposes to dispose of the U.S. Naval Home, Philadelphia, Pennsylvania; and,

WHEREAS, GSA, in consultation with the Pennsylvania State Historic Preservation Officer (SHPO), has determined that this undertaking as proposed would have an adverse effect upon the U.S. Naval Home, a property included in the National Register of Historic Places; and,

WHEREAS, pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. Sec. 470(f)); Section 2(b) of Executive order 11593, "Protection and Enhancement of the Cultural Environment;" and Section 800.4(d) of the regulations of the Advisory Council on Historic Preservation (Council), "Protection of Historic and Cultural Properties" (36 CFR Part 800), GSA has requested the comments of the Council; and,

WHEREAS, pursuant to Section 800.6 of the Council's regulations, representatives of the Council, GSA, and the Pennsylvania-SHPO have consulted and reviewed the undertaking to consider alternatives to avoid or satisfactorily mitigate the adverse effect;

NOW, THEREFORE, it is mutually agreed that the undertaking will be implemented in accordance with the attached proposal from Mr. R. Carlton Brooks, Director, Real Property Division, General Services Administration to minimize adverse effects on the above-mentioned property.

John W. Fowler (date) 10/27/81
Executive Director
Advisory Council on Historic Preservation

Alexander Aldrich (date) 10/28/81
Chairman
Advisory Council on Historic Preservation

ER 8101 0200

STIPULATIONS

The General Services Administration (GSA) will insure that the following measures are taken to avoid or mitigate potential adverse effects of the sale of the United States Naval Home (the Naval Home). All actions will be coordinated with the Pennsylvania State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation (the Council).

1. GSA will offer the property for public sale by sealed bids. Prior to the opening of bids, the property will be advertised for at least 30 days. The advertisements will be in a format generally used by GSA, and will comply in all respects with GSA and Federal Property Management Regulations regarding disposals by public sales.

2. The sale notices will identify the Naval Home and advise prospective bidders that the property is listed on the National Register of Historic Places and must be preserved or protected, and the historic preservation covenants contained in Attachment A will be included in the instrument of conveyance for the property.

3. GSA will advertise the sale widely, utilizing its local and national mailing lists, paid advertising in local and regional newspapers, and by providing publicity releases to national publications. Notices of sale will be addressed specifically to all interested parties who have contacted GSA, the SHPO, or the holding agency.

4. Upon completion of the bid opening, GSA will advise the SHPO and the Council of the results. If an acceptable bid is not received, GSA will consult with SHPO and the Council on further action to be taken to effect the disposition of the property. To the extent that revised plans are necessary to accomplish disposition, GSA, the SHPO, and the Council may mutually agree to the revision of these stipulations.

GENERAL SERVICES ADMINISTRATION

[signature] 10-5-81

Director, Real Property Division, FPRS (Date)

PENNSYLVANIA STATE HISTORIC PRESERVATION OFFICER

[signature] 9/20/81

Pennsylvania SHPO (Date)

ER81 101 0300

COVENANTS

The United States Naval Home will be conveyed subject to the following covenants, which shall be considered as covenants running with the land:

A. Any alteration, improvements, new development and/or demolition at the U.S. Naval Home complex shall be made only after obtaining the written approval of the Pennsylvania State Historic Preservation Officer and the Advisory Council on Historic Preservation.

B. In the event of a violation of the above covenant, the State Historic Preservation Officer or the General Services Administration may institute a suit to enjoin such violation or for damages by reason of any breach thereof.

C. These covenants shall be binding on the Grantee, and all heirs, successors and assigns in perpetuity. However, the Advisory Council on Historic Preservation, in consultation with the State Historic Preservation Officer may, for good cause, modify or cancel any or all of the provisions of these covenants upon application of the Grantee or the Grantee's successors in interest.

Invitation No: GS-OW-DR(P)-12218A GSA Control No: 3-N-PA-684

Opening Date: March 10, 1982

BID FOR PURCHASE OF GOVERNMENT PROPERTY
(To be executed and submitted in duplicate).
FOR SALE OF

UNITED STATES NAVAL HOME, containing approximately 20.53 acres of fee land and 33 buildings located at Bainbridge Street and Grays Ferry Avenue, Philadelphia, Pennsylvania

TO: GENERAL SERVICES ADMINISTRATION
NATIONAL CAPITAL REGION
7TH AND D STREETS, SW.
WASHINGTON, DC 20407

SUBJECT TO: (1) The provisions of this Invitation for Bids, including the Schedule portion thereof; (2) the Instructions to Bidders, GSA Form 1741; (3) the General Terms of Sale, GSA Form 1742; (4) the Special Terms of Sale, Invitation No: GS-OW-DR(P)-12218A and (5) the provisions of the Bid Form and Acceptance, all of which are incorporated herein as a part of this bid, the undersigned bidder hereby offers and agrees, if this bid is accepted within 60 calendar days after date of bid opening, to purchase the property described in said Invitation for Bids for which bid price is entered below:

BID PRICE

$ 1,200,000.00

Enclosed is a certified check, cashier's check, or postal money order payable to General Services Administration in the sum of ONE HUNDRED TWENTY THOUSAND DOLLARS ($ 120,000.00) as a bid deposit. THIS BID IS SUBJECT TO THE FOLLOWING CONDITIONS DESCRIBED in Attachment A.

ATTACHMENT A

THIS BID IS SUBJECT TO THE FOLLOWING CONDITIONS:

(1) Toll Brothers shall receive all necessary local, state and federal approvals to develop the Naval Home for no less than two-hundred (200) dwelling units.

(2) Toll Brothers will submit their plan to the Pennsylvania State Historic Preservation Officer and the Advisory Council on Historic Preservation after a zoning permit has been granted.

(3) The Pennsylvania State Historic Preservation Officer and the Advisory Council on Historic Preservation would have thirty (30) days to review the development proposed.

(4) Toll Brothers will settle within sixty (60) days of receiving all necessary approvals.

IF THE ABOVE CONDITIONS ARE NOT SATISFIED, Toll Brothers shall be under no obligation to settle the property and all deposit money shall be returned.

In the event this bid is accepted the instruments of conveyance should name the following as Grantee(s):

TOLL BROTHERS, INC., or Nominee

101 Witmer Road, Horsham, Pa. 19044

(include name of spouse, if applicable)

BIDDER REPRESENTS: (check appropriate box)

1. That he operates as; an [ ] individual doing business as _____ or a [ ] partnership consisting of _____, or a [X] corporation, incorporated in the State of Pennsylvania, or a [ ] trustee, acting for _____.

2. (a) That he [ ] has, [X] has not, employed or retained any company or person (other than a full-time bona fide employee working solely for bidder) to solicit or secure this contract, and (b) that he [ ] has, [ ] has not, paid or agreed to pay any company or person (other than a full-time bona fide employee working solely for the bidder) any fee, commission, percentage, or brokerage fee, contigent upon or resulting from the award of this contract; and agrees to furnish information relating to (a) and (b), above, as requested by the Contracting Officer. (For interpretation of the representation, including the terms "bona fide employee", see FPMR 101-45.313-4 (41 CFR 101-45.313-4).)

Name and address of bidder (street, city, state, zip code and telephone number including area code) (type or print).

Toll Brothers, Inc.
101 Witmer Road, Horsham, Pa. 19044
215-441-4400

Signature of person authorized to sign bid. W. Joseph Duckworth

Signers name and title (type or print).

W. Joseph Duckworth
Executive Vice President

CERTIFICATE OF CORPORATE BIDDER

I, George E. Casey, Jr. Certify that I am

Vice President of the Corporation named as
(Sec. or other official title)

bidder herein; that W. Joseph Duckworth who signed this

bid on behalf of the bidder, was then Executive Vice President
(Official title)

of said Corporation; that said bid was duly signed for and on behalf of said

Corporation by authority of its governing body and is within the scope of its

corporate powers.

(SEAL)

ACCEPTANCE BY THE GOVERNMENT

The foregoing bid No. GS-OW-DR(P)-12218A as conditioned in Attachment A to this Offer is accepted by and on behalf of the

United States of America, acting by and through the Administrator of General

Services, on this 18th day of March, 1982.

Signature of Contracting Officer

(For General Services Adm)

Title of Contracting Officer
B. C. MALTBY
Director
Real Property Division

COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION
WILLIAM PENN MEMORIAL MUSEUM AND ARCHIVES BUILDING
BOX 1026
HARRISBURG, PENNSYLVANIA 17108

June 8, 1982

Zvi Barzilay
Project Manager
Toll Brothers
101 Witmer Road
Horesham, Pennsylvania 19044

Re: ER#81-101-0200

Dear Mr. Barzilay:

I enjoyed meeting with you and Dick Tyler on the Naval Home complex and I am hopeful we can all work together for the successful rehabilitation and redevelopment of the site. To summarize our discussion, there are three historic preservation requirements that need to be addressed in planning your development project.

A) Philadelphia Historical Commission - All the buildings on the Naval Home grounds are classified as historic buildings or landmarks by the city of Philadelphia. Under a city ordinance (14-2008 Historic Buildings) no demolitions or alterations may be undertaken without a permit from the Department of Licenses and Inspections, which is granted only after review of the project by the Philadelphia Historical Commission. While the city can recommend the postponement of demolition, the period cannot exceed six months.

While the time is not ripe to request any kind of permits from the city, Dick Tyler has offer the possibility of a preliminary review by the Commission. In both of our opinions the requirements for rehabilitation under Federal Law (see next two sections) should satisfy any concern of the city in this area.

B) Advisory Council on Historic Preservation - As you know sale of this property is subject to covenants running with the land that require any alteration, new development and/or demolition at the complex to be made only after obtaining written approval of my office (Bureau for Historic Preservation (BHP)) and the Advisory Council on Historic Preservation (ACHP). To enable you to make the best possible decision before entering into the purchase of the site, I would recommend that you obtain written preliminary approval from the BHP and ACHP of your redevelopment plan for the entire complex which should include provisions for the eventual documentation of significant structures that may be demolished and use of the Secretary of Interior's Standards for any rehabilitation work.

Zvi Barzilay
June 8, 1982
Page 2

This review should be coordinated with the National Park Service. I have suggested to ACHP that we all meet to visit the site and develop a preliminary approval letter.

C) National Park Service - If an important element of your development of the site is use of the 25% investment tax credit, then I also suggest you coordinate your plans with the Regional Office of the National Park Service (NPS) who have the responsibility for certification of rehabilitation for the tax benefits. Because this project is so important (and complex), NPS will probably agree to give a preliminary review of the proposal. As you know their review will encompass the total site plan not just the rehabilitation of specific historic structures. This may raise questions about any proposed demolition.

In conclusion, I will try and set a meeting later in June to arrive at a preliminary approval position. If you have any further questions, do not hesitate to call.

Sincerely yours,

Brenda Barrett, Director
Bureau for Historic Preservation
(717)783-5321

cc: Richard Tyler

United States Department of the Interior

NOV 22 1982

NATIONAL PARK SERVICE
WASHINGTON, D.C. 20240

IN REPLY REFER TO:

File ck
Naval Home

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NOV 22 1982
PH&MC
EXECUTIVE DIRECTOR

NOV 9 1982

Mr. Zvi Barzilay
Toll Brothers
101 Witmer Road
Horsham, Pennsylvania 19004

Dear Mr. Barzilay:

I am writing to briefly summarize the agreements we reached during our meeting in Philadelphia on November 1, 1982.

Toll Brothers is seeking preliminary approval that the proposed development of the U.S. Naval Home property would meet the Secretary of the Interior's "Standards for Rehabilitation" to qualify for Federal tax incentives contained in section 212 of the Economic Recovery Tax Act of 1981. At this time, you are asking that, as part of this process under Department of the Interior regulations 36 CFR Part 67, I approve the preliminary site plan prepared by Wallace Roberts and Todd.

Because the 1979 U.S. Naval Home Reuse Study attaches equal architectural significance and reuse potential to Laning Hall and Biddle Hall, I must have very convincing information supporting the infeasibility of reusing Laning Hall before I can approve its demolition as part of the overall project. We agreed that a letter addressed to me containing such supporting information could fulfill this requirement. We also agreed that a check-list of preservation treatments—mutually endorsed by this office and your firm—would have to be prepared for the five Strickland buildings at the front of the site (Biddle Hall, the two residences and the north and south gate houses) before I would approve the preliminary site plan. The framework for this check-list will be prepared during a visit to the Naval Home site on November 10, 1982, with a final version submitted to you shortly thereafter. I want to emphasize that final certification for the rehabilitation project will occur only after completion of the project, and will be conditioned upon your carrying out the elements contained in the above-mentioned preservation check-list.

Finally, we discussed the fact that my approval of the preliminary site plan would be contingent upon minor modifications in the location of certain proposed new residential units.

I look forward to a productive visit on the 10th, and to our arrival at a mutually agreeable preliminary site plan.

Sincerely,

/s/ Lee H. Nelson

Lee H. Nelson, AIA
Chief, Preservation Assistance
Division

cc: PA-SHPO
Advisory Council
Mr. Richard Tyler

United States Department of the Interior

NATIONAL PARK SERVICE
WASHINGTON, D.C. 20240

IN REPLY REFER TO:

NOV 30 RECD

ER # file

NOV 24 1982

Mr. Zvi Barzilay
Project Manager
Toll Brothers
101 Witmer Road
Horsham, Pennsylvania 19044

Dear Mr. Barzilay:

Based on our discussions during the U.S Naval Home site visit on November 10, 1982, I have prepared a list of preservation, maintenance and repair needs which will be necessary to retain the historic character of the five William Strickland Buildings at the front of the site. With your endorsement and commitment to undertake the rehabilitation according to the following list of conditions, and with my receipt of a letter adequately justifying the demolition of Lanung Hall, I am prepared to approve the overall development proposal for the U.S. Naval Home site. I would expect Part 2 of a Historic Preservation Certification Application to be completed at your earliest convenience and sent through the State Historic Preservation Officer to this office for review. As more detailed plans for the U.S. Naval Home are drawn up, I would expect further consultation with you and your architects.

I. BIDDLE HALL

1. Roof - The standing seam metal roof, with its dormers and monitors, is a prominent feature integral to the original Strickland design of Biddle Hall. Its slope, color and protruding features place a visual cap on the facade of the building. The materials, slope, color of the roof -- including those elements of the dormers, and monitors -- will be retained in place and repaired. If necessary because of the deteriorated condition, all or part of the roof and its features may be replaced with historically appropriate materials installed and finished in the same manner as the original materials. If undertaken, this treatment will maintain an accurate historical appearance of the roof and its features when viewed from the front of the building. In order to insure the future structural integrity of Biddle Hall, the roof drainage system (including gutters and downspouts) will be repaired using historically appropriate details.

2. Verandas

The verandas on the north and south wings of Biddle Hall contribute in a substantial way to the strong horizontal character of these portions of the building. Their openness, punctuated by cast iron columns and wrought iron railings, contributes to this character. To maintain the original character of the front facade verandas, they will be left open, unenclosed, and unobstructed by any permanent or obtrusive partitions. To insure their future integrity, the iron columns and railings will be retained in place, repaired in a sensitive manner if necessary, and repainted in a historically appropriate color.

Cutting down and converting certain selected windows to doors will be allowed on the front facades of the wings. The new doors will be detailed in a manner consistent with the character of the verandas and the facade. The remaining windows will be retained intact and repaired, or, if necessary due to deteriorated condition, replaced with windows having the same reveal, pane configuration, muntin profile, and color as the original windows. The rear elevation verandas may be enclosed using glazing with vertical joints placed behind the cast iron columns. All of the glazed enclosures, if installed, will be placed behind the iron columns and rails and will maintain the sense of openness which the verandas possess. Unobtrusive stairways will be allowed on the rear elevation verandas to provide vertical circulation.

3. Facade Masonry and Main Block Stylistic and Ornamental Features

Biddle Hall's monumental, classically detailed portico conveys more clearly than any other feature on the site William Strickland's participation in the Classical Revival movement in the United States. Because of its symmetry, scale, materials, and detailing, it remains one of the finest examples of Greek Revival architecture in America. As a result of the importance of this portion of the site, no substantive alterations will be undertaken on the facade's main block and flanking bays. Selective masonry cleaning, using the gentlest means possible (no abrasive methods), may be used to remove rust stains. Masonry on the entire building (including the wings) will be repointed, if and where necessary, using mortar to match the original mortar in composition, strength, color, and tooling. Window and door openings on the main block and flanking bays of the facade will remain unchanged, nor will any new openings be introduced. Window sash, frames and doors will be left intact and repaired or, where necessary due to deteriorated condition, replaced with those matching the reveal, pane and panel configuration, muntin and mullion size, profile, and color as the originals. The monumental stairway beneath the portico will remain intact and undivided. The non-original tent frames flanking the stairway will be removed. Unobtrusive railings may be installed, if required by code, to restrict access to or make safe for pedestrian use the masonry platforms currently occupied by the tent frames.

4. Domed Assembly Hall

The symmetrical domed assembly hall is the most significant interior space on the site. It conveys the classical ideals of the Greek Revival movement, and is undeniably integral to the overall architectural character of Biddle Hall. The assembly hall will remain intact and restored, with no permanent vertical or horizontal partitions installed.

5. Interior Features

Certain features on the interior of Biddle Hall, including the vaulted ceilings, fireplaces, main stairway, doors and trim convey methods of construction and detailing present in high-quality architecture of the early and mid-19th century, but not present in modern construction. Where possible, fireplaces and mantles, vaulted ceilings and doors with their hardware and trim will be retained in place and it

necessary, repaired. The flat arch main stairways will be retained in place. It is recognized that, on the top floor of the Biddle Hall wings, interior partitioning of the roof monitors will be necessary to meet fire code regulations. Where possible, however, the monitors will be kept glazed and used to light dwelling units below. The monitors will not be substantially altered in a manner that would cause a change in their exterior visual appearance.

6. Biddle Hall Annex

As a later and much less architecturally significant addition to the building, the demolition of Biddle Hall Annex will be permitted.

II. GOVERNOR'S RESIDENCE AND SURGEON GENERAL'S RESIDENCE

1. Exteriors

The original exterior integrity and architectural detailing of the two Strickland-designed residences remains intact. These fine examples of Greek Revival residential architecture, through both their stylistic expression and placement, are integral to the architectural character of the Naval Home site. The exterior appearance of the two residences will be retained intact and restored. The iron porch columns and railing will be sensitively repaired and repainted. The windows and doors will be retained and repaired or, where necessary due to deteriorated condition, replaced with those matching the reveal, pane and panel configuration, muntin and mullion size and profile, and color as the originals. The stucco, scored to resemble finished stone, will be restored using historically appropriate materials and detailing, and will be repainted a historically appropriate color. An order to insure the future physical integrity of the residences, the roofs and drainage systems (including gutters and downspouts) will be repaired using historically appropriate detailing.

2. Interiors

Both residences were designed and constructed with opulent and finely detailed interior spaces and features. The original spatial configuration of the Governor's Residence remains largely intact, while the Surgeon General's Residence floor plan has been substantially altered. In both residences, most of the original elaborate wood fireplace mantles trim, and other ornamentation have survived intact, while much plaster cornice molding has suffered water damage. In reusing the residences, the spatial arrangement of the Governor's Residence will be kept intact, with no substantial permanent partitioning. Some further partitioning of the Surgeon General's Residence will be allowed. As much as possible of the extant wood window trim; doors, hardware and door trim; interior shutters; fireplace boxes, mantles and marble surrounds mantles; free-standing columns; and undamaged plaster molding will be retained intact and, where necessary, repaired.

III NORTH AND SOUTH GATEHOUSES AND FRONT FENCE

The north and south gatehouses and front iron and stone fence are, both stylistically and in their detailing, compatible with the Strickland buildings on the site. They help frame the front of the Naval Home site and, from inside and outside perspectives, contribute to its finely ornamented architectural character. The exteriors character of both gatehouses will be preserved. The windows and doors will be repaired and retained or, if necessary due to deteriorated condition, replaced with

those matching the reveal, pane and panel configuration, muntin and mullion size and profile, and color as the originals. The exterior stucco will be restored, where necessary, using historically appropriate materials and detailing (including scoring), and painted an historically appropriate color. The standing seam metal roofs and drainage systems (including gutters and downspouts) will be repaired or, where necessary due to deteriorated condition, replaced with historically appropriate detailing. The iron fence and gates between the gatehouses will be sensitively repaired and repainted using historically appropriate colors and detailing. The marble fence base will be cleaned, if necessary, using the gentlest means possible (no abrasive methods), and repointed, where necessary, using mortar matching the original in composition, strength, color, and tooling.

My final condition relates to the placement (on your site plan) of the new housing units between Biddle Hall and the Governor's Residence. Alternatives to this placement shall be considered so that the units are placed well behind the front plane of Biddle Hall (not forward of the centerline axis of Biddle Hall, as is proposed for the new units between Biddle Hall and the Surgeon General's Residence).

I look forward to your response to these conditions and to your written justification for the demolition of Lansing Hall. Should you have questions about any aspect of this letter, please do not hesitate to let me know.

Sincerely,

Lee H. Nelson Signed

Lee H. Nelson, AIA
Chief, Preservation Assistance
Division

cc: PA-SHPO Attn: Brenda Barrett

Advisory Council, Attn: Charlene Dwin

Philadelphia Historical Commission Attn: Dr. Richard Tyler

United States Department of the Interior

NATIONAL PARK SERVICE
WASHINGTON, D.C. 20240

IN REPLY REFER TO:

RECEIVED
FEB 22 1983
HISTORIC PRESERVATION

FEB 16 1983

Mr. Zvi Barzilay
Toll Brothers
101 Witmer Road
Horsham, Pennsylvania 19044

Dear Mr. Barzilay:

Re: U.S. Naval Home, Philadelphia, Pennsylvania

Thank you for your letter of November 24, 1982, and the enclosure from Wallace, Roberts & Todd concerning the infeasibility of reuse for Laning Hall. I trust that you have received my letter of the same date listing conditions for the rehabilitation of the five Strickland buildings (and their setting) which must be met before preliminary approval of your proposed project can be granted for use of the Federal tax incentives.

The Wallace, Roberts & Todd letter does not, on its own, adequately document the economic infeasibility of developing Laning Hall. However, my own inspection of the building, coupled with an assimilation of the information in the comprehensive reuse study published in 1980, have convinced me of the infeasibility of developing Laning Hall. Its demolition (together with demolition of all other non-Strickland era buildings) will not preclude ultimate certification of the project, provided that the conditions of my letter of November 24, 1982 are met, and that the historic character of Biddle Hall, the flanking buildings, the frontal setting, gatehouses, and front wall/fencing are preserved. These preservation aspects are essential to sustain the landmark status for this property, and to receive the tax benefits.

It is my understanding that you have recently received City Council approval of a zoning variance for the site that will allow your project to proceed. I look forward to receiving a Part 2 Historic Preservation Certification Application, via the State Historic Preservation Office, in the near future so that review of the whole project by this office and the State can be accomplished in an expeditious manner. National Park Service preliminary approval of the project cannot be issued without the receipt and approval of an acceptable Part 2 Application for each of the buildings to be preserved and/or rehabilitated. Such an application must document the preservation aspects outlined in my November 24 letter.

As you know, final certification of rehabilitation can be issued only when the work is completed and the structure is placed in service. If you have any questions about my decision or the certification process, please let me know.

Sincerely,

How about us?

/s/ Lee H. Nelson

Lee H. Nelson, AIA
Chief, Preservation Assistance Division

cc: Brenda Barrett

COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION
WILLIAM PENN MEMORIAL MUSEUM AND ARCHIVES BUILDING
BOX 1026
HARRISBURG, PENNSYLVANIA 17120

August 3, 1983

Lee H. Nelson, Chief
Preservation Assistance Division
U. S. Department of the Interior
National Park Service
18th and C Streets, N.W.
Washington, D. C. 20240

Re: U. S. Naval Home, Philadelphia

Dear Lee:

We recently received from the Solkin Group persepective rendering showing the new construction and its relationship to the historic buildings on the Naval Home site. We would like to offer the following comments for your consideration:

1. The placement of the new buildings appears to be the same as earlier submitted to the city under the zoning approval. Per your comments at an earlier meeting on the project, we would like to see the building sited further from the historic buildings and at least (for the two on either side of Biddle) behind the center line of Biddle Hall. The plan with the rendering may not be precise - but I think the possibility of moving those buildings, even slightly, should be explored.

2. The scale, massing and design of the new construction is acceptable. While the material to be used has not been specified we believe the buildings' color and texture is a critical issue. Because the historic buildings on the site are range from light tan/yellow to gray, we believe the new construction should be in that color range. The texture should be as "flat" and close to that of stone or stucco as possible. We believe stucco would be the best treatment, but would consider a brick or other material which met those guidelines. We strongly believe that red brick would not be compatible with the historic structures and would not be an acceptable material. The fact that red brick is common in Philadelphia and the surrounding neighborhood is irrelevent.

Please let me know if you have any other comments or questions.

Sincerely,

Brenda Barrett, Director
Bureau for Historic Preservation

cc: Dick Tyler
Zvi Barzilay
Elliot Rothchild
Thomas C. Barton

United States Department of the Interior

NATIONAL PARK SERVICE
WASHINGTON, D.C. 20240

In Reply Refer To:

F78(424)

AUG 25 1983

DW
See me

Mr. Thomas C. Barton, III
Salkin Group, Architects and Planners
1528 Walnut Street
Philadelphia, Pennsylvania 19102

Dear Mr. Barton:

Re: U.S. Naval Home, Philadelphia, Pennsylvania

Thank you for your letter of July 14 and the perspective drawings of the new construction — in relation to Biddle Hall and the historic residences — which accompanied it. I apologize for the delay in responding; summer is a difficult time.

I am pleased with your design of the new units in the historic context; their scale and massing is quite compatible. However, I have two concerns. First, as I said in my letter of November 24, 1982, which responded to the proposed site plan: "My final condition relates to the placement (on your site plan) of the new housing units between Biddle Hall and the Governor's Residence. Alternatives to this placement shall be considered so that the units are placed well behind the front plane of Biddle Hall (not forward of the centerline axis of Biddle Hall...)." It appears from the most recent drawing that no change has been made in the location of the units. Please reassess the new housing units' proposed placement on the site to minimize their impact on the historic buildings.

Secondly, you mention the materials to be used in the new construction and cite compatibility with the surrounding communities as well as with the materials on the Naval Home site. It seems to me that compatibility with materials in the surrounding communities is unnecessary, as this site is so insulated from them. Your reaction at our June 20th meeting to the discussion of a stucco coating on the new construction was not positive. I would like you to rethink that position in light of the fact that the historic residences and the gatehouses have painted stucco walls. Stucco would be a low-maintenance solution, and could be colored a buff or gray to blend well with the stone and stucco of the historic buildings on the site. Please consider these concerns, and feel free to contact me or Susan Dynes of my staff at 202-343-9590, if you have any questions.

Sincerely,
Lee H. Nelson

RECEIVED
AUG 1983
HISTORIC PRESERVATION

Lee H. Nelson, AIA
Chief, Preservation Assistance
Division

cc: PA SHPO - attn: Brenda Barrett
Zvi Barzilay 101 Witmer Road
Toll Brothers Horsham, PA 19044
Philadelphia Historical Commission attn: Dr. Richard Tyle
Advisory Council on Historic Preservation attn: Charlene D

Toll Brothers 101 WITMER ROAD, HORSHAM, PA. 19044 (215) 441-4400

RECEIVED
SEP 14 '83
Bureau
HISTORIC PRESERVATION

September 9, 1983

Ms. Brenda Barrett
Director
Bureau for Historic Preservation
Pennsylvania Historical & Museum Commission
Box 1026
Harrisburg, Pa. 17120

Re: U.S. Naval Home
Philadelphia

Dear Brenda:

Your letter of August 3, 1983 caught us somewhat by surprise, since it is not consistant with our previous discussions.

With regard to your first comment, I would like to advise you that Lee Nelson requested that we consider to set back the buildings on either side of Biddle Hall a couple of feet behind the facade of Biddle Hall as opposed to "behind the center line of Biddle Hall" as described in your letter. We have modified our site plan in response to Lee Nelson's request and we are hopeful that the City will approve the change, since it is not entirely consistant with the previously approved Zoning Plan.

Your second comment is of great concern to us. In our previous discussions, it was generally agreed that the new construction would be less restricted, since the forum and the material would be conventional and therefore would not be constructed to resemble the historic structures. It was also brought up that the new construction would accentuate the historic buildings and their symmetrical setting. The use of red brick is not foreign to this site. Lanning Hall and the wall surrounding the site are

Ms. Brenda Barrett
September 9, 1983
Page 2

built out of red brick and both seem to be very compatible with the entire site.

As we all realize, the Naval Home site is not in the most ideal location, and major compromises would have to be made in order to market this site. "The fact that red brick is common in Philadelphia and the surrounding neighborhood," is a very relevent issue, which could not be overlooked, as we have been advised by our Marketing Consultants. There are various examples throughout the country where unindigenous materials were a major marketing obstacle. I trust that neither you nor us would like to see the market resistence to purchasing units in the Naval Home. Therefore, I hereby request that you withdraw from your recent request, and provide us with the flexibility necessary to make our project a success.

I am looking forward to your response.

Very truly yours,

TOLL BROS., INC.

Zvi Barzilay

Zvi Barzilay
Vice President

ZB/bhn
Two Pages
CC: Lee Nelson
Dick Tyler
Elliot Rothachild
Tom Barton

United States Department of the Interior

NATIONAL PARK SERVICE
WASHINGTON, D.C. 20240

IN REPLY REFER TO:

DW

F78(424)

RECEIVED
MAR 21 '84
PUBLIC HISTORIC PRESERVATION

MAR 15 1984

Mr. Zvi Barzilay
Toll Brothers
101 Witmer Road
Horsham, Pennsylvania 19044

Dear Mr. Barzilay:

Thank you for arranging the March 6 meeting with the State Historic Preservation Office staff, the National Park Service staff, Richard Tyler, your development team, and others with an interest in the future of the U.S. Naval Home, a National Historic Landmark in Philadelphia.

It was useful for us all to discuss the three major issues that have come to light as a result of the State's review of your Historic Preservation Certification Application--Part 2. Those issues are: the proposal to put parking in front of Biddle Hall, the intention to widen the north gate from Gray's Ferry Avenue to allow for two-way traffic, and the proposal to enlarge the windows on the front of the main block of Biddle Hall. Of the three items brought up at the March 6 meeting, two were resolved, and the third (parking in front of Biddle Hall) was exhaustively discussed, so that the site designers have guidance for redesigning the parking plan to preserve the landmark setting of Biddle Hall, the Commandant's residence and the Surgeon General's residence.

Parking on the lawn in front of Biddle Hall is, as was obvious at the meeting, something about which we have grave concerns; any final plan must retain the historic setting for the landmark structures. As stated in the U.S. Naval Home Reuse Study, "The...ensemble of three major Strickland-designed buildings arranged around the great tree-shaded lawn, with ancillary gate houses and cast-iron fence, creates an irreplaceable and unique environment... Historically, this group is nationally important as the home of three important institutions: the Naval Asylum, the Naval Home and for a short time, the Naval Academy. Architecturally, this group is important as the largest collection of Strickland-designed buildings still standing. The survival of this quiet green oasis, now surrounded by the dense urban fabric of the city, is a rare urban event." We concur with that assessment of the buildings and their setting.

We understand the need for substantial numbers of parking spaces on the site because of the density of housing units. The lawn, which serves as a frontispiece for the Strickland-designed buildings, must, however, remain as untouched as possible. To try to insert as many as 65 parking spaces in this location would be unacceptable. As I stated at the meeting, maintining the vista of Biddle Hall and the two residences

Mr. Zvi Barzilay 2

from Gray's Ferry Avenue is essential. We look forward to seeing a new site plan that accomplishes that aim, even if it means reducing the number of new units built. Another option you might consider is to provide basement parking in those new buildings at the northeast of the site that cannot have three floors because of the grade change. An "Interpreting the Standards" bulletin concerning a similar case is enclosed for your information.

Widening of one gate, and changing the operation of the other can, we believe, be successfully accomplished. The enlargement of windows in the center section of Biddle Hall is an unacceptable change to the landmark. Before final approval of your project, we will need to review detailed drawings on the parking and on the entrance gate issues. As I am sure you are aware, this project, like all of the others for which the 25% ITC is sought, must meet the Secretary's "Standards," and maintain the historic character of the properties involved. A copy of the standards and guidelines is enclosed for your information.

In spite of the fact that your Part 2 application has not yet been transmitted to our office, I feel that we have come much closer to an ultimate approval of your proposed project. I hope that all other problems can also be resolved as they arise. Please feel free to contact me or my staff if you have any questions regarding our review.

Sincerely,

/Sgd/ Gary L. Hume

Gary L. Hume
Acting Chief, Preservation
Assistance Division

Enclosures

cc: MARO (Harrison) ACHP (Charlene Dwin)

PA SHPO (attn: Brenda Barrett)

Richard Tyler

United States Department of the Interior

NATIONAL PARK SERVICE
WASHINGTON, D.C. 20240

Hist Pres.

IN REPLY REFER TO:

MAY 15 1984

L1427(424)

RECEIVED
MAY 10 '84
HISTORIC PRESERVATION

Mr. Zvi Barzilay
Toll Brothers
101 Witmer Road
Horsham, Pennsylvania 19044

Dear Mr. Barzilay:

We are in receipt of the revised site plan dated April 12, 1984, which responds to the issue of the parking lot in front of Biddle Hall and our concerns about the impact of the parking lots on the National Historic Landmark setting. While we believe that the modifications made to the plan attempt to address our concerns on this one issue, we are extremely disturbed about other changes which have appeared on this plan for the first time.

During our discussions with you in Philadelphia on March 5, 1984, with regard to what we consider excessive number of parking spaces on the Naval Home site, you responded to a question from Susan Dynes, Historical Architect on my staff, that the number of parking spaces was absolutely necessary to service the 390 units (on the City Council "approved" plan) to be located on the site. We now note that the April 12 plan identifies 402 units. The site plan also indicates that the additional 12 units will be located in the three historic buildings. We are concerned about increasing the number of units in the three buildings from 65 to 77. We remind you that a detailed list of features that must be preserved in Biddle Hall, the Surgeon General's House and the Governor General's House was identified in our letter to you dated November 24, 1982. The additional 12 units also undermine your argument for the ratio of parking spaces vis-a-vis housing units. You will recall that there was considerable discussion on this point in our Philadelphia meeting.

While you have addressed the parking spaces in front of Biddle Hall, the changes to the parking plan in three other areas: between Biddle Hall and the Governor General's House, between Biddle Hall and the Surgeon General's House, and directly in front the Surgeon General's House, have increased in the number of spaces to the point that they are negatively impacting the setting. Changes to this design will be necessary. For example, the parking lot in front of the Surgeon General's House is within a few feet of the veranda and located directly in front of the house. Our suggestion in the Philadelphia meeting was that increased parking could be placed in that area but it should be located toward the perimeter of the property, not directly in front of the building.

An additional new item to appear on the site plan is the traffic control court immediately within the main gate on Gray's Ferry Road. The size of this facility alone is disturbing. Three lanes of traffic, a large fence-enclosed area and another gatehouse, located approximately 70 feet behind the gate, appears to be

Mr. Zvi Barzilay page 2

excessive, and quite contrary to our frequently stated objective to preserve the setting of Biddle Hall and the two residences. Since it is our understanding that there will be a 24-hour security guard at the gate, we do not see the need for a new gatehouse or accommodations for three lanes of traffic. To comply with the preservation objective, parking and traffic control areas must be minimized not expanded as in the April 12 site plan.

Because of the serious questions which these new items raise, the National Park Service cannot address, in isolation, the single issue of the parking spaces in front of Biddle Hall. Regrettably, our attempts to deal with one issue at a time on the very complex problems of the development of this National Historic Landmark site have proven most unsuccessful because of the manner in which you make changes and introduce new elements into the development proposal. Therefore, before the National Park Service will proceed with any further review of this project, all documents must be submitted including the complete plans for the rehabilitation of Biddle Hall and the two residences.

Sincerely,

(Signed) Gary L. Hume
Gary L. Hume
Deputy Division Chief
Preservation Assistance Division

cc: Richard Tyler
Executive Director
Philadelphia Historical Commission
1313 City Hall Annex
Philadelphia, PA 19106

Advisory Council on Historic Preservation
1100 Pennsylvania Ave., NW., #809
Washington, D.C. 20004

Dr. Larry E. Tise
State Historic Preservation Officer
Pennsylvania Historical and Museum Commission
P.O. Box 1026
Harrisburg, PA 17108

General Services Administration, Region 4
75 Spring Street, S.W.
Atlanta, Georgia 30303

DD/BL for fil
ER 81-101-0200

December 31, 1984

4-N-PA-664
Contract No. GS-04-DR-(F)12218N

RECEIVED
JAN 04 1985
HISTORIC PRESERVATION

Mr. Zvi Barzilay, Vice-President
Toll Brothers
101 Witmer Road
Horsham, PA 19044

Dear Mr. Barzilay:

Thank you, and Bob Toll, for taking the time to see me. As promised, I have contacted a number of persons involved in the historic preservation aspects of the Naval Home project. After conversations with Mr. Tyler of the Philadelphia Commission and Ms. Donna Williams of the Pennsylvania Commission I have concluded it is in Toll Brothers best interest to proceed as follows:

1) Get working drawings for the three significant buildings, guard houses, gates, wall, etc. to Mr. Tyler so as to complete the approval process with the Commission. This, as you know, is a necessary part of the permit process.

2) Prepare the complete tax act part II submission for the entire project. Submit this to the Commission in Harrisburg. After review there, and any necessary modifications, the package should go to the National Park Service (NPS) in Washington. I understand the Advisory Council (Ms. Charlene Dwin) is willing to accept the judgement of NPS which will make life a little easier for you.

3) After completion of the above, you should be in a position to submit your revised plan to the city and proceed with obtaining the needed permits.

I cannot overly stress the importance of providing a complete development plan to all of the concerned parties as soon as possible.

I raised the issues of proceeding on the basis of conceptual design and proceeding with new construction only. Neither of these proposals are possible, so there are only two realistic actions open to you. Either proceed as outlined above or close all effort and voluntarily default.

2

I hope you will elect to proceed. I will be happy to meet with you at any time to assist in any way I can.

Please keep me posted as to your progress.

Sincerely,

Signed B. C. MALTBY

B. C. MALTBY
Director
Disposal Division

cc:
Mr. Tyler
Philadelphia Historical Commission
1313 City Hall Annex
Philadelphia, PA 19107

Ms. Donna Williams
Commonwealth of Pennsylvania
Pennsylvania Historical and Museum Commission
William Penn Memorial Museum
and Archives Building
Box 1026
Harrisburg, PA 17120

Advisory Council On Historic Preservation

The Old Post Office Building
1100 Pennsylvania Avenue, NW, #809
Washington, DC 20004

MAY 3 1 1985 81-0200-10

MAY 24 1985

EXECUTIVE DIRECTOR

Mr. Zvi Barzilay
Vice President
Toll Brothers Development Corporation
101 Witmer Road
Horsham, PA 19044

REF: Proposed Adaptive Reuse of the U.S. Naval Home Complex
Philadelphia, Pennsylvania

Dear Mr. Barzilay:

This is a follow up letter to the meeting of April 4, 1985, with representatives from your development team, the National Park Service, the city of Philadelphia, the Pennsylvania State Historic Preservation Officer (SHPO), and the Council.

As you are aware, the Council's review of this project is required by the ratified Memorandum of Agreement of October 28, 1981. The MOA provides for the property to be transferred with preservation covenants that allow the Council and Pennsylvania SHPO to review redevelopment plans for the property. Your proposal, which calls for the demolition of all but the Strickland Buildings and front gates and gatehouses, has been submitted to us for review. However, we have concerns with several elements of the proposed plans for both new construction and rehabilitation.

During the meeting we identified those treatments that required further clarification. It was our understanding that you would prepare the following documentation and forward it to the National Park Service and the Council within a two week period:

a. a conceptual plan for the treatment of the entrance gates;

b. a scope of work proposed for the rehabilitation of the gate houses;

c. evaluation of the feasibility of retaining the west gatehouse;

d. study of the location of existing exterior lighting and its location in the redevelopment project;

e. documentation of how historic elements removed as part of this project will be categorized and stored;

f. analysis of proposed changes to the fenestration of Biddle Hall;

g. documentation of the proposed treatment for the east and perimeter walls;

h. documentation of the proposed treatment of the veranda, including the repair of the floors;

i. evaluation of the feasibility of retaining the gazebo;

j. documentation of proposed site improvements, including the use of outdoor furniture;

k. documentation of proposed treatment and reuse of buildings flanking Biddle Hall; and

l. documentation regarding the location of HVAC equipment in Biddle Hall.

To date we have not received any of this information. Given your desire to initiate construction activities by September 1985, we are concerned that we will have insufficient time to complete our review.

We would like to be kept informed of the status of this project. If there are to be extended delays, advise us accordingly so that we will know when to expect the information. We are prepared to provide any assistance we can to allow you to meet your deadlines; yet, we remain concerned about materials arriving at the last possible moment and unrealistic demands made for the Council's comments.

If we can be of further assistance, please contact Ms. Charlene Dwin at 202-786-0505.

Your continued cooperation in this matter is appreciated.

Sincerely,

Don L. Klima
Chief, Eastern Division
of Project Review

United States Department of the Interior

NATIONAL PARK SERVICE
P.O. BOX 37127
WASHINGTON, D.C. 20013-7127

IN REPLY REFER TO:

F73(424)

OCT 17 1985

RECEIVED
OCT 28 1985
HISTORIC PRESERVATION

Mr. Zvi Barzilay
Vice President
Toll Brothers
101 Witmer Road
Horsham, Pennsylvania 19044

Re: U.S. Naval Home, Philadelphia, Pennsylvania
Project Numbers: PA-84-0874, 0875, 0876, 0877 and 0886
Taxpayer Identification Number: 23-2327504

Dear Mr. Barzilay:

We have completed the review of the revised "Historic Preservation Certification Application - Part 2" for the above listed properties and dated July 2, 1985. These revised applications were received in our office on August 13, 1985. The proposed rehabilitation of Biddle Hall, the Governor's Residence, the Surgeon General's House, the Gatehouses and Fence, and the proposed site plan and landscaping meet the Secretary of the Interior's "Standards for Rehabilitation" with certain understandings and conditions that are explained below:

Understandings developed through meetings and on-site inspections:

There will be no changes to the size and shape of window openings on the central pavilion of the facade of Biddle Hall. A previous proposal to enlarge windows in the central pavilion is not a part of this Part II application.

Cleaning specifications for the masonry walls and the iron fence will be submitted to the National Park Service for review and approval prior to undertaking the work. Specifications for the stucco repair and masonry repointing will also require review and approval before commencing work.

The apartment doors on the rear verandah of Biddle Hall will be wooden six panel doors as shown in the October 1983 drawings.

All doors and interior trim in the rotunda will be preserved in place. Doors from the rotunda into flanking apartments will be left in place with any code-required construction placed behind the doors.

The only work to be undertaken at this time on the interior of the Governor's Residence and the Surgeon General's Residence will be such repair and maintenance required to prevent further deterioration of the historic materials. When plans are developed for the interior work on these two

Mr. Zvi Barzilay 2

landmark structures, they will require review by the State and the National Park Service for conformance with the Secretary of the Interior's "Standards for Rehabilitation."

Specifications on the exterior lighting fixtures and code required exit stairs, railings and equipment will be submitted for review and approval as this material is developed.

The Part II application is approved with the following conditions:

All original interior wood trim in Biddle Hall, removed as part of the furring out and insulating of the external masonry walls, is to be carefully reinstalled in its original location. This is specifically a requirement for the second floor, but is a general requirement for all windows surrounds, bases, chairrails, etc., that remain in place and are from the earliest periods of construction.

The masonry base of the fence enclosing the entrance gate compound will be eliminated from the design to minimize the impact of this fencing on the historic setting.

If changes and/or amendments to the project are proposed, these changes and/or amendments must be reviewed and approved in writing by the National Park Service. Any revised material submitted for conformance with the condition listed above should be submitted to this office through the State Historic Preservation Office. Also, any substantive change in the work as described in the revised applications, dated July 2, 1985, should be brought to our attention in writing prior to execution to ensure continued conformance.

While the review process for this project, involving city, state and multiple Federal approvals, has been particularly complicated, we are pleased to note that the final designs for this national historic landmark will preserve a high degree of historic material and will preserve the historically significant setting for the three-building complex.

Sincerely,

(Signed) Gary L. Hume

Gary Hume,
Deputy Chief, Preservation
Assistance Division

cc: Mr. Gary Ruben, RA
Director of Design
Historic Landmarks for Living
30 S. Front Street
Philadelphia, PA. 19106

Ms. Charlene Dwin
(Advisory Council)

Ms. Donna Williams
(SHPO-PA)

Mr. Dick Tyler
Executive Director
Philadelphia Historical Commission
1313 City Hall Annex
Philadelphia, PA. 19106

SHPO

Advisory Council On Historic Preservation

The Old Post Office Building
1100 Pennsylvania Avenue, NW, #809
Washington, DC 20004

DEC 19 1985

Mr. Zvi Barzilay
Vice President
Toll Brothers
101 Witmer Road
Horsham, PA 19044

REF: Proposed Adaptive Reuse of the Naval Home Complex
Philadelphia, Pennsylvania

Dear Mr. Barzilay:

Thank you for your recent response to our letter of May 24, 1985. The additional information that was submitted allows the Council to complete its review of your redevelopment proposal for the U.S. Naval Home Complex, as specified in Covenant A of the ratified Memorandum of Agreement dated October 21, 1981, among the General Services Administration, the Pennsylvania State Historic Preservation Officer and the Council.

The current plans for the siting and design of new construction within the complex, including proposed parking areas, is sympathetic to the character of this property. Because proposed plans limit the construction of townhouses to the rear of the complex, new construction will not significantly alter the historic setting along Gray's Ferry Avenue. As you are aware, one of our primary concerns has been that proposals would alter the setting and exteriors of the historic Strickland buildings which front on Gray's Ferry Avenue-- Biddle Hall, the Surgeon Generals's House and the Governor's Residence. The concerns we submitted to you regarding the initial plans for the rehabilitation of Biddle Hall have now been resolved. The plans have been revised to incorporate sensitive treatments that will result in the retention of the existing window openings in the Central Pavillion area, the repair of the existing flooring on the verandah and replacement in-kind, as necessary, and the reuse of significant interior elements. Therefore, we find that the proposed rehabilitation of Biddle Hall adheres to the recommended approaches in "The Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings." It is unfortunate that the Surgeon General's House and the Governor's Residence are not to be rehabilitated as part of this phase of the redevelopment proposal. However, we encourage you to take, as quickly as possible, appropriate measures to stabilize the interiors and exteriors of these buildings so that they will not be allowed to deteriorate through neglect.

We are pleased to see that the current proposals call for the reuse of the existing light fixtures and the gazebos within the complex. The incorporation of these elements into the site improvement plans for Biddle Hall will certainly preserve the historic setting of the front of the complex. While, it is regrettable that the west gate house will have to be demolished, your plans to rehabilitate and reuse the north and south gate houses along with the new entrance gates offers an acceptable compromise solution.

Overall, we find the current proposal for the redevelopment of the U.S. Naval Home acceptable. In order to satisfy the requirements of Covenant A, we would like to ensure that Toll Brothers consults with us in the event that substantial revisions are made and in the development of future plans for the complex. Agreement to the following conditions will evidence your acceptance of this responsibility:

1. If any major modifications are made to the plans for new construction (i.e. revisions in siting, modifications to the existing design concept, relocation of parking areas, etc.) or the proposal for the rehabilitation of Biddle Hall as presented in the meeting of April 4, 1985, and in the revised plans submitted on October 31, 1985, Toll Brothers will forward the proposed revisions to the Pennsylvania SHPO, or his designee, and the Council for review and approval within a 14-day period.

2. Plans for the rehabilitation and reuse of the Surgeon General's House and the Governor's Residence will be submitted to the Pennsylvania SHPO, or his designee, and the Council for review and approval prior to the initiation of any construction activities on the buildings.

3. Prior to the demolition of Lanning Hall, Toll Brothers will record the structure. This will be done so that there will be a permanent record of the existence and appearance of the structure prior to its demolition. The Historic American Buildings Survey (HABS)[National Park Service, 600 Arch Street, Philadelphia, Pennsylvania] will be contacted to determine the appropriate level of documentation required. Documentation must be accepted by HABS and the Pennsylvania SHPO notified of its acceptance prior to demolition.

If you agree to these conditions, please sign the concurrence line and return this letter to the Council.

The Council would like to take this opportunity to commend Toll Brothers for the concerted effort they have made over the last three years to address the preservation issues related to the redevelopment of this National Historic Landmark. We are certain that once Phase I is completed, the project will be noted for its creativity in preserving the historic setting of the U.S. Naval Home while developing the remainder of the complex for intensive residential development.

We wish you much success with this exciting project.

Sincerely,

Don L. Weima
Chief, Eastern Division
of Project Review

Concur: _____ (date) _____

United States Department of the Interior

NATIONAL PARK SERVICE
P.O. BOX 37127
WASHINGTON, D.C. 20013-7127

IN REPLY REFER TO:

H4215(424)

APR 17 1987

RECEIVED

APR 2 1987

HISTORIC

Mr. John V. Neale, Jr.
Assistant Commissioner
Office of Real Property Policy and Sales
General Services Administration
18th and F Streets, N.W.
Washington, D.C. 20405

Dear Mr. Neale:

The National Park Service has grave concerns about the preservation status and physical condition of the U.S. Naval Home in Philadelphia, Pennsylvania. The U.S. Naval Home is currently owned by the General Services Administration but a contract is pending to sell this property for development to Toll Brothers, Inc. of Horsham, Pennsylvania. The National Park Service is involved in this project because the developer has applied for Federal tax incentives for rehabilitating the buildings under the Internal Revenue Code.

The U.S. Naval Home is a National Historic Landmark, designed by the architect William Strickland. It is our understanding that the General Services Administration (GSA) has been looking for reuse proposals for this property since 1976. In 1982, GSA entered into a contract that includes preservation restrictions with Toll Brothers, Inc. for the sale of the approximately-18 acre Naval Home property.

The National Park Service has been actively involved in the project since 1982. We have met numerous times, in Philadelphia and Washington with the developer, the Advisory Council on Historic Preservation, the GSA Atlanta Regional Office, the City of Philadelphia, and the Historic Preservation Office of the Commonwealth of Pennsylvania. After considerable negotiation, we believed that all the concerns of the various preservation agencies had been addressed, and in 1984 the National Park Service issued a preliminary certification of rehabilitation (under the Internal Revenue Code, final certification can be issued only after the work is completed). The final conveyance of the property, however, has not yet taken place because Toll Brothers, Inc. has requested and received several extensions of the contract for sale under the terms of that contract. Consequently, no work has been undertaken on these buildings for at least ten years. We are concerned that these nationally important buildings will continue to sit vacant, unheated and without maintenance, literally rotting away, unless the developer takes title to the property and begins work on the buildings. This increasing deterioration is also affecting their historic and architectural integrity.

This situation has continued for an excessively long period of time. Therefore, we request that the sale be executed at the end of the current contract extension. We

Mr. John V. Neale, Jr. 2

also urge that provisions be made for the maintenance of the buildings during that period between closing on the sale and the completion of the rehabilitation. If the developer is unwilling to proceed with the project and close on the sale of the property, we recommend that all necessary preparations be made to reoffer the property for sale to a purchaser who could undertake such a project in a reasonable time so that our ultimate goal can be achieved--the long term preservation and reuse of this architecturally and historically significant property.

My staff and I would be pleased to give you a complete briefing on the U.S. Naval Home and current reuse proposal, if you would like. Please feel free to contact me or Gary Hume of the Preservation Assistance Division (343-9573), for any further information.

Sincerely,

/Sgd/Jerry L. Rogers

Jerry L. Rogers
Associate Director, Cultural Resources

cc: Mr. Braney Maltby
Office of Real Estate Sales -4DR
General Services Administration
75 Spring Street, SW
Atlanta, Georgia 30303

Ms. Donna Williams
Deputy State Historic Preservation Officer
Pennsylvania Historical and Museum Commission
P.O. Box 1026
Harrisburg, Pennsylvania 17108

Ms. Charlene Dwin
Advisory Council on Historic Preservation
1100 Pennsylvania Avenue, N.W. #809
Washington, D.C. 20004

Mr. Dick Tyler
Executive Director
Philadelphia Historical Commission
1313 City Hall Annex
Philadelphia, Pennsylvania 19106

Zvi Barzilay, Vice President
Toll Brothers
101 Witmer Road
Horsham, Pennsylvania 19044

Assistant Commissioner
Office of Real Property Management and Policy
General Services Administration
18th and F Streets
Washington, D.C. 20405

Advisory
Council On
Historic
Preservation

The Old Post Office Building
1100 Pennsylvania Avenue, NW, #809
Washington, DC 20004

RECEIVED
JUN 25 1987
HISTORIC PRESERVATION

81-0200-101

June 12, 1987

Mr. John V. Neal, Jr.
Assistant Commissioner
Office of Real Property and Sales
General Services Administration
18th and F Streets, NW
Washington, DC 20405

REF: Disposal of the U.S. Naval Home Complex
Philadelphia, Pennsylvania

Dear Mr. Veal:

We recently received a copy of the letter of April 17, 1987, to you from the National Park Service regarding the referenced project.

On December 19, 1985, the Council forwarded a letter of "Conditional No Adverse Effect" to Mr. Zvi Barzilay of Toll Brothers, the successful bidder for the Naval Home which had been excessed by the Department of the Navy to GSA in the late seventies. Although Toll Brothers has complied with the provisions of the Preservation Covenants attached to the ratified Memorandum of Agreement of October 28, 1981, it appears that the property still has not been formally transferred. Consultation among Toll Brothers, the National Park Service, the Council and the Pennsylvania State Historic Preservation Officer was initiated in April 1982. Between 1982 and 1985, we held numerous meetings to review the proposed scope of work and develop a mitigation plan that would ensure the sensitive treatment of the Strickland Buildings along Gray's Ferry Avenue and compatible new construction on the remainder of the site. Unfortunately, the project is not proceeding according to the schedule we were given, nor has Toll Brothers taken the necessary actions to ensure that the significant buildings are adequately maintained to avoid deterioration through neglect.

We endorse the recommendations of the National Park Service that provisions be made to conclude the sale of the property to Toll Brothers at the end of the current extension period; that measures be taken to ensure that Toll Brothers implements a maintenance program that will commence as soon as possible and continue until the project is completed; and that GSA take steps to reoffer the property if the developer decides not to go forward with the purchase. The Council has been involved in the review of plans to dispose of the U.S. Naval Home Complex since 1976. We are therefore concerned about the ongoing delays related to the disposal and preservation of this National Historic Landmark. We remain committed to monitoring the activities related to the redevelopment of the property to ensure that the Preservation Covenants developed by the consulting parties are satisfactorily fulfilled and that every effort is taken to avoid adverse effects to the property.

In order for us to stay apprised of the current status of this project, we request that you provide us with a status report which includes the current development schedule from Toll Brothers if they are to proceed with closing. If they choose not to go forward with the purchase of the U.S. Naval Home Complex, GSA should advise us of future actions that will be taken to comply with the provisions of the Agreement.

Your continued cooperation in this matter is appreciated.

Sincerely,

Charlene L. Dwin

for Don L. Klima
Chief, Eastern Division
of Project Review

General Services Administration, Region 4
75 Spring Street SW.
Atlanta, GA 30303

August 27, 1987

4-N-PA-684

RECEIVED
SEP 2 1987
HISTORIC PRES...

Dr. Richard Tyler
Philadelphia Historical Commission
1313 City Hall Annex
Philadelphia, PA 19107

Dear Dr. Tyler:

On March 19, 1987, you attended a meeting with Zvi Barzilay of Toll Brothers, Inc. and H. Howard DeVane of this office, concerning the closing of the sale of the U.S. Naval Home.

We have a contract with Toll Brothers, Inc. which we will enforce fully and unequivocally. This contract is contingent on Toll Brothers receiving all necessary local, state, and federal approvals to develop the property for no less than 200 dwelling units. We were almost in a position to close when the City of Philadelphia changed its guidelines concerning historic preservation. As was pointed out in the March meeting, we feel that a five-year delay is unconscionable, and we intend to conclude this matter, one way or another, no later than March 1988.

To this end, certain understandings were reached at this meeting. Toll Brothers, Inc. agreed to re-submit its reuse plan for Laning Hall and has done so. The General Services Administration (GSA) agreed to monitor the progress of Toll Brothers, Inc. toward compliance with the terms of our contract, but have been precluded from doing so by your failure to respond to us.

Our letters to you of June 9, July 13, and July 27, 1987, all asked what your decision was on the reuse of Laning Hall. While you are under no legal obligation to answer GSA, you make it impossible for us to determine if Toll Brothers, Inc. is doing everything it can to consummate this sale. We assume they are.

We continue to receive letters from third parties blaming GSA and Toll Brothers, Inc. for the lack of development of this facility. All we can tell these people at this time is that you have failed

to advise us of your response, if any, to the reuse plan submitted to you on May 21, 1987.

Sincerely,

PATRICIA E. BAILEY, Acting Director
Office of Real Estate Sales

PATRICIA E. BAILEY
Acting Director
Office of Real Estate Sales

cc: Toll Brothers, Inc.
Attn: Zvi Barzilay
101 Witmer Road
Horsham, PA 19044

Ms. Donna Williams, Director
Pennsylvania Historical
and Museum Commission
P. O. Box 1026
Harrisburg, PA 17108-1026

CITY OF PHILADELPHIA

PHILADELPHIA HISTORICAL COMMISSION
1313 City Hall Annex
Philadelphia, Pennsylvania 19107
MU 6-4543 and MU 6-4583

EDWARD A MONTGOMERY, JR
Chairman

RICHARD TYLER, Ph.D
Historic Preservation Officer

PATRICIA SIEMIONTKOWSKI
Assistant Historic Preservation Officer

TA
File

SEP 14 1987

HISTORIC PRESERVATION

10 September 1987

US Naval Home.

Patricia E. Bailey
Acting Director
Office of Real Estate Sales
General Services Administration, Region 4
75 Spring Street
Atlanta, GA 30303

Dear Miss Bailey:

Thank you for your letter of 27 August 1987 and previous ones concerning the United States Naval Home in Philadelphia. I can readily understand your desire to resolve this matter, for we, too, would like to see the realization of the development potential of this significant historic complex.

From the very beginning, the City and the Historical Commission assumed an active role in seeking a reuse consistent with historic preservation for the Naval Home. To this end in 1979-1980, the City retained Wallace, Roberts and Todd, and Day and Zimmerman to undertake a comprehensive reuse study of the facility with funding provided by the City and the National Park Service through the Pennsylvania Bureau for Historic Preservation. Upon the acceptance by the General Services Administration in 1982 of an offer by Toll Brothers for the Naval Home, the City strove to facilitate the expeditious development of the site by Toll Brothers. This included a prompt rezoning of the Parcel to RC-6 and the commitment of substantial Community Development Block Grant monies to the adjacent neighborhood.

By June of 1982, the Pennsylvania Bureau for Historic Preservation, the National Park Service and this Commission had begun to work with Toll Brothers in the expectation of the prompt implementation of a development plan. Throughout 1982, 1983, 1984 and 1985 the several federal, state and municipal agencies conducted a series of meetings and exchanged numerous letters with Toll Brothers in an effort to resolve diverse issues such as the treatment of the front lawn, the siting and materials of the new construction, the overall site plan and the demolition of Laning Hall. The submission of plans and the response to questions in a piecemeal fashion hindered somewhat this process. Finally, in October 1985, the National Park Service issued a conditional approval of Toll Brothers' "Historic Preservation Certification Application - Part 2" for the Naval Home.

I should like to clarify the role of the Philadelphia Historical

Patricia E. Bailey
Page 2
10 September 1987

Commission and its staff in the whole process. This becomes particularly important in view of the letter dated 7 July 1987 from Douglass R. Gamble of Toll Brothers to Don L. Klima of the Advisory Council on Historic Preservation with copies to you and Howard DeVane. Indeed, the Commission directed that I respond to that letter.

Although this Commission has no formal or legal role in the review of applications for the federal tax incentives or compliance with section 106 of the National Historic Preservation Act of 1966, as amended, I did participate in many of the meetings with the state and federal preservation agencies and Toll Brothers since 1982. I recall objecting, occasionally strenuously, to several elements, including the materials and siting of the new construction, particularly in relationship to the three Strickland buildings; the overall site plan which I believed failed to reflect the urban context of the Naval Home, and the intrusion of parking on the front lawn. Indeed, I understood that the concurrence in the demolition of Laning Hall represented a concession in return for the preservation of that front lawn. I think it more accurate to say that I accepted, rather than approved, many of these elements over the several year course of the process, and that this acceptance stemmed from a deference to the consensus formed by that process and to the very limited authority over demolitions provided in the 1955 preservation ordinance.

Under Philadelphia's historic preservation ordinance of 1955, this Commission could designate buildings only, review building permit applications for such properties, and delay demolitions for a period not to exceed six months. Pursuant to this ordinance, the Commission approved the demolition of Laning Hall in March 1983 with the understanding that the front lawn would be maintained. In November 1983, the Commission's Architectural Committee considered a submission for Biddle Hall, the Surgeon's House, the Governor's House and the new construction. The Committee found the proposal for Biddle Hall acceptable and suggested but modest revision. During its discussion, the Committee raised objections to the parking plan for the front lawn and noted that the massing of the new townhouses did not take full advantage of the available site and that some more sympathetic treatment could have been developed. The Committee also observed, however, that the ordinance did not extend a jurisdiction to the Commission over the new construction. At its meeting of September 1985, the Commission approved plans for the rehabilitation of Biddle Hall for sixty-two apartment units subject to our receipt of a complete set of specifications. The Commission also requested plans for other proposed renovations at the Naval Home and for the use of the front lawn. The specifications arrived in March 1986 and were approved. This process left the developer free in early 1986 to begin work on Biddle Hall and to demolish Laning Hall; indeed, the demolition could have occurred anytime after 3 March 1983.

On 1 April 1985, a new historic preservation ordinance went into effect in Philadelphia; I have enclosed a copy of it for your reference. It empowered the Commission to designate buildings, structures, sites,

objects and districts, provided for review of new construction, and established new standards for granting of demolition permits. When we notified the developer's architect in March 1986 of the approval of the rehabilitation of Biddle Hall, we also asked, pursuant to the new ordinance, for the plans for the Governor's House and Surgeon's House, the treatment of the Gatehouses and Fence, the site plan and landscaping design, and the plans for new construction. We received a site plan and schematic drawings for new construction in December of that year. At its January 1987 meeting, the Commission approved in concept the stabilization of the Governor's House and Surgeon's House and requested a stabilization plan. It also required a minor change in the new security fence. Once again the Commission expressed concern about the siting of the new construction, particularly its relationship to the Governor's and Surgeon's Houses, the use of the front lawn for parking, and the design of the new townhouses. The Commission also drew attention to the requirements of the new ordinance for demolition permits. In February 1987, the Law Department, as counsel to the Commission, requested the Department of Licenses and Inspections not to renew the demolition permit for Laning Hall upon its expiration on 26 March 1987, a full four years after its issuance and just days short of two years after the effective date of the new ordinance.

At the request of Toll Brothers, the Architectural Committee held a special meeting on 21 May 1987 to address these several issues. The developer did present the old site plan and proposal for the new construction without consideration given to the several suggestions raised over the years. Much of the discussion, however, focused on the demolition of Laning Hall. To demonstrate the necessity of razing Laning Hall, the developer submitted a letter from its architect that described a possibility for introducing 46 apartments into Laning Hall and that stated that the plan would be inefficient. We also received a letter from Richard W. Huffman, who had participated in the 1979-1980 study. It reviewed briefly the history of the site since 1980 and essentially reiterated the conclusions of the 1979-1980 study. The Committee's Chairman noted that in order to evaluate an application for demolition we must have the data specified in Section 7(f)(.1-.7) of the ordinance. Subsequently, I sent to the developer's counsel a copy of a previous, successful submission to serve as a model. To date, we have received no additional material.

I have based this letter on a careful review of our files which date back to 1960. I believe that the record reflects a consistency of articulated concern, especially for the front lawn, the site plan, and the design of the new construction. Moreover, on many issues the National Park Service and the Bureau for Historic Preservation raised similar questions. I also think that we have shown considerable forbearance and patience while the Naval Home continues to deteriorate. We exercised only that jurisdiction allowed in the law prior to 1985 and did not invoke the demolition provisions of the 1985 ordinance until 1987. In addition, various City departments sought to facilitate the expeditious

implementation of this development, including rezoning, rehabilitating a number of houses in the immediate neighborhood and approving permit applications. Again, Laning Hall could have come down anytime between March of 1983 and March of 1987, and work could have started on Biddle after March 1986; but nothing was done. This is not a record of obstructionism by the City of Philadelphia or the Historical Commission.

As of this date, we continue to await the information requested in May 1987 to demonstrate the necessity for the demolition of Laning Hall and a new application for a demolition permit. I can assure you that upon its receipt we will respond promptly.

Should you require any additional information, please do not hesitate to contact me.

Yours truly,

Richard Tyler /pm

Richard Tyler
Historic Preservation Officer

RT:sj

Encl.

cc: Don L. Klima, Advisory Council for Historic Preservation
Douglass R. Gamble, Toll Brothers, Inc.
Donna Williams, Director, Bureau for Historic Preservation
Jerry T. Rogers, National Park Service
Katherine C. Stevenson, Mid-Atlantic Regional Office, National Park Service
Edward A. Montogmery, Jr., Chairman, Mellon Bank
Christine Washington, Advocate Community Development Corp.
David Brownlee
Joan Ferreira
Caroline Golab
David Hollenberg, John Milner Associates
Jason Nathan
Reverend William D. Thompson
Christopher Cashman, Deputy Director of Commerce
David Dambley, Commissioner, Dept. of Public Property
Barbara Kaplan, Executive Director, City Planning Commission
Rebecca Northrop, Office of Housing
John Street, Esq., Councilman, 5th District
David Wismer, Deputy Commissioner, Dept. of Lic. & Insp.

Appendix C: Demolition of Laning Hall

CITY OF PHILADELPHIA

LAW DEPARTMENT
15th Floor Municipal Services Building
Philadelphia Pa 19102 - 1692

20 February 1987

Roland Hall, Chief
Construction Section
Department of Licenses and Inspections
Public Service Concourse
Municipal Services Building
Philadelphia, PA

RECEIVED
FEB 23 1987
DEPT. OF LIC. & INSP.
CHIEF, CONST. SEC.

RE: U.S. Naval Home
2420 Grays Ferry Avenue

Dear Mr. Hall:

On 18 March 1983, the staff of the Philadelphia Historical Commission stamped and signed an Application for Building Permit to allow for the demolition of selected buildings on the Naval Home property. This application was signed pursuant to Historical Commission action taken at its meeting of 3 March 1983. Subsequently, a permit was issued by the Department of Licenses and Inspections and extended numerous times. The most recently granted extension will expire on 26 March 1987.

On 28 January 1987, the proposed development of the Naval Home property once again came before the Historical Commission. The Historical Commission and its Architectural Committee considered informally the following issues:

1) plans for the stabilization of the Governor's Residence and Surgeon General's house;
2) the proposed treatment of the gatehouse and fence;
3) the proposed site plan and landscaping design;
4) plans for new construction on the site including elevation drawings, details and building material specifications.

In particular, the proposed demolition of Laning Hall, a John McArthur designed building located on the Naval Home site, received special attention. Under the Historical Commission's original preservation ordinance, the Commission could only delay demolition for a period of six months. The old law did not require that an owner of a designated building give consideration to the preservation and reuse of a designated building and, as a result, many buildings with a potential for an economic reuse were demolished. With the passage of a revised preservation ordinance in December of 1984 came new and expanded powers for the

Roland Hall
Page 2
20 February 1987

Historical Commission. Under the revised preservation ordinance (14-2007) an owner of a designated building must demonstrate that no reasonable, economic reuse of a designated resource exists and that demolition is necessary.

It is my understanding that in exercising its discretion in determining whether to renew permits, the Department of Licenses and Inspections considers, among other factors, whether there has been a change in the law since the time the permit was originally issued. Given the change in the city's preservation law and the outstanding significance of McArthur's Laning Hall, I, as counsel for the Philadelphia Historical Commission, request that the Department of Licenses and Inspections refrain from granting any further extensions on the permit allowing the demolition of buildings on the Naval Home site at 2420 Grays Ferry Avenue.

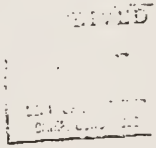
If you should wish to review this matter with me or with members of the Historical Commission staff, we will meet with you at your convenience.

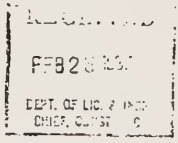
Sincerely,

Mark MacQueen
Assistant City Solicitor

MM:sj

cc: David Wismer, Deputy Commissioner
Licenses and Inspections
Patricia Siemiontkowski
Philadelphia Historical Commission





CITY OF PHILADELPHIA

LAW DEPARTMENT
15th Floor, Municipal Services Building
Philadelphia, Pa 19102-692

SEYMOUR KURLAND
City Solicitor
686-5231

March 9, 1988

Commissioner John Plonski
Department of Licenses & Inspections
720 Municipal Services Bldg.
Philadelphia, PA 19102

Re: Permit No. 82056 - Demolition
2420 Grays Ferry Avenue

Dear Commissioner Plonski:

I am writing to correct any misunderstanding which may have resulted from a letter dated February 20, 1987, sent by Mark McQueen, an Assistant City Solicitor, to Roland Hall, Chief of Construction, Department of Licenses and Inspections ("L&I"), concerning the above referenced Permit, which was issued by L&I on or about March 18, 1983.

I understand that the Permit when issued, was valid for six (6) months and was extended many times, at the request of the owner, and each extension was for a ninety (90) day period. In February, 1987, Mr. McQueen, then counsel to the Philadelphia Historic Commission (the "Commission"), wrote to Roland Hall concerning inter alia: (1) a pending informal review by the Commission and its Architectural Committee; (2) the original Historic Preservation Ordinance ("14-2007") which was in effect at the time the Permit was granted; and (3) the revised Historic Preservation Ordinance of December, 1984, Ordinance No. 316, which became affective April 1, 1985 ("14-2007, as amended"). In view of this information, Mr. McQueen while acknowledging that the extension of a Permit was a matter within L&I's discretion, went on to state the following:

Commissioner Plonski
March 9, 1988
Page -2-

> "Given the change in the city's preservation law and outstanding significance of McArthur's Laning Hall, I, as counsel for the Philadelphia Historical Commission, request that the Department of Licenses & Inspections refrain from granting any further extensions on the permit allowing the demolition of buildings on the Naval Home Site at 2420 Grays Ferry Avenue."

After a review of this matter, it appears that the intent of this letter should have been to request L&I to take into consideration the fact that 14-2007 had been amended, when considering whether to grant further extensions of the Permit. Accordingly, the letter should not have been construed to direct or automatically preclude L&I from issuing further extensions.

It is undisputed that the Permit had been extended many times, since the effective date of the 14-2007, as amended, and such extensions were permissible pursuant to Title 4 of the Philadelphia Code.

However, in responding to yet another request by the owner to extend the Permit, Mr. Hall, by letter dated March 10, 1987, advised the owner as follows:

> "In this case, I have been advised by the Law Department that Section 14-2007 of the Zoning Code regulating Historic Buildings was amended effective April 1, 1985, and that no further extensions of the Permit be granted". (Emphasis added).

From this letter it appears that Mr. McQueen's letter was construed to automatically preclude L&I from granting the requested extension. To the extent that Mr. McQueen's letter created this impression, it was inadvertent and incorrect.

Commissioner Plonski
March 9, 1988
Page -3-

L&I was not prohibited as a result of 14-2007, as amended, from granting or denying further extensions of this Permit. To the extent that L&I's determination not to renew the Permit was based on Mr. McQueen's letter, I believe it would be appropriate for you to reconsider this matter and at this time to take such actions as you deem appropriate concerning an extension of the Permit.

I hope this letter clarifies the position of the Law Department concening this matter.

Sincerely,

Kathryn S. Lewis,
First Deputy City Solicitor

KSL/pac

Attachments

March 10, 1987

Mr. Zvi Barzilay
TOLL BROTHERS, INC.
101 Witmer Road
Horsham, Pa. 19044

RE: Building Permit No. 82056/83
2420 Grays Ferry Avenue

Dear Mr. Barzilay:

Please be advised that your request for an extension of the above referenced permit is denied.

Permit extensions can not be granted in cases where the laws under which the original approvals were granted have changed. In this case, I have been advised by the Law Department that Section 14-2007 of the Zoning Code, regulating historic buildings, was amended effective April 1, 1985, and that no further extensions of the permit be granted.

You may file new applications for the work authorized by the permit and such applications will be reviewed by the Historical Commission and by this Department based on laws in effect on the date of application.

Sincerely,

Roland W. Hall, P.E.
Chief, Construction Section

RWH/lmh

cc: District #2
Dep. Comm. Witmer
Patricia Sieminatkowski, Historical Commission
Mark MacQueen, Law Department - [illegible]
File

CITY OF PHILADELPHIA

DEPARTMENT OF LICENSES AND INSPECTIONS
Municipal Services Building, Philadelphia, Pa. 19102

JOHN PLONSKI
Commissioner

DAVID L. WISMER
Deputy Commissioner

CLARENCE C. MOSLEY
Deputy Commissioner

March 22, 1988

Mr. Zvi Barzilay
Toll Brothers, Inc.
101 Witmer Road
Horsham, Penna. 19044

Re: Building Permit #82056-83
2420 Grays Ferry Avenue

Dear Mr. Barzilay:

The Department of Licenses and Inspections has been advised by First Deputy City Solicitor Kathryn S. Lewis that we are not bound by a previous letter dated February 20, 1987 from Assistant City Solicitor Mark MacQueen.

Accordingly, we have re-evaluated all the circumstances of the case and have considered the following facts:

(1) Building Permit #82056 for demolition of Laning Hall at 2420 Grays Ferry Avenue was issued on March 18, 1983.

(2) Building Permit #82056 was issued a series of 90 day extensions through March of 1987.

(3) Further extension was denied by letter of March 10, 1987 from Roland W. Holt, P.E., Chief of Construction, based on the letter from Mr. MacQueen.

(4) Departmental policy in effect through December 31, 1987, would preclude extension of a permit beyond its five year anniversary of issue for any reason. The five year date on the subject permit is March 18, 1988.

(5) Toll Brothers took title to the property on March 10, 1988, from the Federal General Services Administration.

(6) You committed to undertake once to stabilize the remaining existing buildings on the site. This work will include repair of roof leaks, sealing of windows, repair of downspouts, removal of damaging vegetation, and protection from vandalism.

Mr. Zvi Barzilay
Page #2
March 22, 1988

In consideration of the above, we have concluded that the subject permit should be reinstated for one ninety day period, to expire on June 30, 1988.

Be advised that no extensions will be granted beyond June 30, 1988. If work is commenced by June 30, 1988, the permit will, of course, remain in effect until completion of demolition provided that there is no cessation of activity for more than 180 days.

Sincerely,

JOHN PLONSKI
Commissioner

JP/DLW/s

cc: Roland W. Hall, P.E., Chief, Construction Section
Dr. Richard Tyler, City Historian
Flora Barth Wolf, Chief Assistant City Solicitor

CITY OF PHILADELPHIA

BOARD OF LICENSE AND INSPECTION REVIEW
716 Municipal Services Building
Philadelphia, Pa 19107

September 28, 1988

Christopher F. Stouffer, Esq.
1100 One Penn Center Plaza
Philadelphia, Pa., 19103

RE: Appeal No. 25016
Appellant: The Preservation Coalition of Greater Philadelphia
Premises: 2420 Grays Ferry Avenue
Subject Matter: Demolition Permit Objection
Executive Session

Dear Sir:

This is to advise you of the decision of the Board of License and Inspection Review in regard to the above appeal (s), as verbally announced at a public hearing held September 22, 1988.

CITY AFFIRMED.

AN APPEAL FROM THIS DECISION MAY BE TAKEN TO THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY WITHIN 30 DAYS FROM THE DATE OF THIS DECISION LETTER.

BOARD OF LICENSE AND INSPECTION REVIEW

JAMES M. SCOTT, JR.
Administrator

JMS/gc
cc: Lenard L. Wolffe, Esq.

81-Misc.-121 (Rev. 6/89)

EXHIBIT A

CITY OF PHILADELPHIA

LAW DEPARTMENT
15th Floor Municipal Services Building
Philadelphia, Pa 19107

MAY 16 1991

May 9, 1991

Lenard Wolffe, Esquire
Portnoy, Haupt & Wolffe
45 Darby Road
Paoli, PA 19301

re: City of Philadelphia vs. Toll Naval Associates
CCP, April Term, 1991, No. 3022

Dear Mr. Wolffe:

Please find enclosed a copy of the Court Order entered in the above-captioned matter.

Your attention is directed to paragraph 5 which schedules the compliance hearing for June 13, 1991, at 9:30 a.m. in Courtroom 2020, 1500 Chestnut Street, Philadelphia, PA.

Sincerely yours,

Curley Antell Cole

CURELEY ANTELL COLE
DIVISIONAL DEPUTY CITY SOLICITOR
(215)592-5340

CAC/c
enclosure
cc: David Wismer, Deputy Commissioner, L&I
Maria Petrillo, Deputy City Solicitor
Christopher Stouffer, Esquire
Stanley Krakower, Esquire

CITY OF PHILADELPHIA, LAW DEPARTMENT
By: CURELEY ANTELL COLE
Divisional Deputy City Solicitor
Attorney Identification No. 33571
1101 Market Street - 10th Floor
Philadelphia, Pennsylvania 19107-2997
Telephone: (215) 592-5340

CITY OF PHILADELPHIA	:	COURT OF COMMON PLEAS
vs.	:	CIVIL TRIAL DIVISION
TOLL NAVAL ASSOCIATES 3103 Philmont Avenue Huntingdon Valley, PA 19006	:	TERM, 19 3922 NO. APRIL TERM 1991

ORDER

AND NOW, this 2nd day of May, 1991, upon consideration of the Complaint and a hearing held thereupon, it is hereby ORDERED and DECREED that:

1. Defendant, TOLL NAVAL ASSOCIATES (hereinafter "defendant"), shall forthwith ~~repair or~~ demolish the imminently dangerous premises located at 2420 Grays Ferry Avenue in the City of Philadelphia (hereinafter "Laning Hall"). The rehabilitation or demolition shall meet the requirements of Title 4 of the Philadelphia Code. The defendant shall allow the subject premises to be inspected by the Department of Licenses and Inspections to determine whether these defective conditions have been corrected.

2. Notice to immediately repair or demolish Laning Hall and the Code violations to be corrected are set forth with

specificity in the Violation Notice attached to the Complaint which was duly served upon the defendant.

3. The defendant shall thereafter maintain the subject premises in compliance with the requirements of the Philadelphia Code of Ordinances, and shall correct in a timely manner any and all violations of which notice is given. Representatives of the City shall be permitted to inspect the subject premises to determine compliance with the Code.

4. The defendant shall allow representatives of the City, including any contractors hired by the City, to enter the subject premises for the purpose of making repairs or demolishing the property.

5. A hearing shall be held on the 13th day of June, 1991, at 9:30 a.m., in Courtroom 1710, One East Penn Square/2020, 1500 Chestnut Street, Philadelphia, PA, to determine what sanctions are to be imposed against the defendant for non-compliance with any of the terms of this Order.

6. This Order shall be entered by the Prothonotary as a Final Decree.

BY THE COURT:

N. CRO J.

Monday, June 16, 1997

INFORMATION FROM THE PRESERVATION ALLIANCE

Fax to: Andrew Terhune

From: Don Meginley

The preservation community is very pleased with most of the development plan as presented in the latest site plan show by Toll Brothers.

Rather than attempt to offer design changes, we have offered a simple four part statement as to what we desire from your organization to meet the requirements of the preservation interests on this project.

This would appear to be a clear opportunity to have your design team attempt to meet the parameters while still producing a project plan which also meets the needs of your company and stock holders.

Certainly the experience and background you displayed for us in our last meeting gives us encouragement that you can take such guidelines and create a modification of the plan which will be both financially successful as well as upholding the commitment to this National Historic Landmark site.

Thanks for your continued efforts in moving forward on this important project.

Telephone: (215) 546-1146 / Fax (215) 546-9109

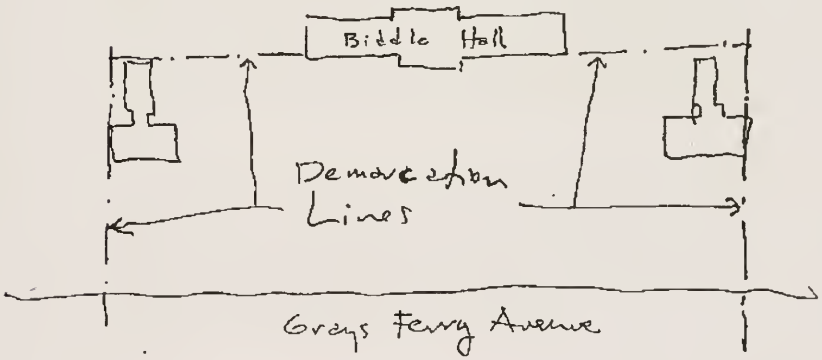
Any plan which will be used to develop the site will:

1. Retain all portions of the three existing historic structures, i.e, Biddle Hall and its two dependencies.

2. Maintain, through stabilization as necessary, the three three historic buildings as soon as possible, especially areas of ongoing deterioration, e.g, at the Governor's Quarters.

3. Preserve the visual and spatial relationships between Biddle Hall and its dependencies, and the views of these three building from public rights-of-way (Gray's Ferry Avenue) by constructing no new buildings or above-grade site features in the zone shown below.

4. Donate a facade and open-space easement for the three historic buildings and their setting as defined by the zone shown below.



Advisory Council On Historic Preservation

The Old Post Office Building
1100 Pennsylvania Avenue, NW, #809
Washington, DC 20004

81-0200-101 file

RECEIVED
NOV 1 3 1997
HISTORIC PRESERVATION

NOV - 4 1997

Mr. Andrew Terhune
Toll Brothers, Inc.
3103 Philmont Avenue
Huntingdon Valley, PA 19006

REF Amendment to the Covenants for the
U.S. Naval Home
Philadelphia, Pennsylvania

Dear Mr. Terhune:

We received your letter of October 22, 1997, following up the October 8th on-site meeting held to discuss Toll Brothers' current development concept for the U.S. Naval Home. As discussed during the meeting, the Council believes that the existing covenant language does not contain adequate provisions to ensure that the setting of the three remaining National Historic Landmark (NHL) Buildings--Biddle Hall, the Governor's House and the Surgeon General's House--is preserved and the buildings are rehabilitated before they deteriorate by neglect. Accordingly, the Council and Pennsylvania State Historic Preservation Officer (SHPO) recommended that the covenants be amended to incorporate basic design principles for the front of the U.S. Naval Home site and more explicit language regarding the preservation and protection of the three NHL buildings

The proposed *Amendment and Restatement of Restrictive Covenants* submitted with your letter is basically consistent with our discussions. However, it does not include the level of detail that the consulting parties--discussed among the City, Pennsylvania SHPO, Council and Preservation Alliance for Greater Philadelphia--thought necessary to protect the U.S. Naval Home. Specifically, the amendment includes a design concept map, but should also 1) outline design guidelines negotiated during the past eighteen (18) months; 2) provide for the stabilization and eventual rehabilitation of the NHL buildings; and 3) provide for resolving disputes that may arise during the Pennsylvania SHPO's review of plans and specifications.

The Pennsylvania SHPO and Council have consulted, and are submitting for your consideration revisions to Toll Brothers' proposed amendment (see enclosed). We believe that incorporation of our revisions will assist Toll Brothers in moving forward with its current development project while reassuring the Pennsylvania SHPO and the preservation community of its commitment to preserve, protect and ultimately reuse the NHL Buildings. Further, language has been included that requires the Council to provide recommendations regarding any disputes in a timely manner so as to avoid delays in project implementation.

Please review our revised amendment and provide written comments to the Pennsylvania SHPO and the Council at your earliest convenience. It may be useful if the Philadelphia Historical Commission and Mayor's Office were also given an opportunity to review our revisions since the City will be required to consider the provisions of the preservation covenants during its review of Toll Brothers' development proposal.

Should you have any questions or desire to discuss this matter further, please contact Mr. Brent Glass, the Pennsylvania SHPO or Charlene Dwin Vaughn, AICP. We appreciate your cooperation in this matter.

Sincerely,

[illegible] Klima
Director
Office of Planning and Review

Enclosures

ACHP AND PENNSYLVANIA SHPO
PROPOSED REVISIONS
to the
AMENDMENT AND RESTATEMENT
OF RESTRICTIVE COVENANTS

- No changes are recommended to page 1, the introductory paragraph and the "Whereas Clauses."

- Paragraphs A, B and C should be revised to read as follows (new language is written in italics):

A. Any alteration, demolition or new development undertaken within the "Approval Area" (as defined in the map in Attachment A) *shall adhere to the design guidelines in Attachment B* and be submitted to the Pennsylvania State Historic Preservation Officer (SHPO) for review and approval. *In the event that the Pennsylvania SHPO objects to proposed demolition plans, design concepts or final plans and specifications because these activities may compromise the integrity of the three National Historic Landmark (NHL) buildings and the covenantee and the Pennsylvania SHPO cannot resolve the objection, the covenantee shall forward all documentation relevant to the objection to the Advisory Council on Historic Preservation (Council), including the covenantee's proposed response to the objection. Within 30-days following receipt of all pertinent documentation, the Council shall take one of the following actions.*

1. Advise the covenantee that the Council concurs in the covenantee's final decision, whereupon the covenantee will respond to the objection accordingly, or

2. Provide the covenantee with recommendations, which the covenantee shall take into account in reaching a final decision regarding its response to the objection.

B. The covenantee shall stabilize and protect the three NHL buildings—Biddle Hall, the Governor's House and the Surgeon General's House—placing them in secure and weather tight condition to prevent damage to the historic fabric or character defining features. The covenantee shall adhere to the procedures set forth in the National Park Service Preservation Brief No.31 and provide the Pennsylvania SHPO with, at a minimum, annual reports summarizing the condition of the three NHL buildings. Upon written request, the Pennsylvania SHPO shall be permitted to inspect the three NHL buildings to verify the conditions of the historic properties.

C. Unless otherwise agreed to by the Pennsylvania SHPO and Council, the covenantee shall initiate rehabilitation activities on the three NHL buildings by January 2000 to ensure the long term preservation of the historic properties.

D. These covenants shall be binding on the covenantee and all heirs, successors and assigns in perpetuity. The Pennsylvania SHPO, *following consultation with the Council*, may for good cause modify or cancel any or all of the provisions of these covenants upon application of the covenantee or the covenantee's successors in interest

ATTACHMENT B

DESIGN GUIDELINES
for
NEW DEVELOPMENT, DEMOLITION AND REHABILITATION
NOVEMBER 1997

1. The covenantee shall ensure that the design of new construction within the "Approval Area" depicted in Attachment A is compatible with the historic and architectural qualities of the U.S. Naval Home, and adheres to *the recommended approaches in* ***The Secretary of Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Standards).*** *The design for the new construction will adhere, at a minimum, to the provisions outlined below.*

   a. The parade ground in front of Biddle Hall shall be retained as open space

   b. The set back for new construction shall be established behind the front facades of the three NHL buildings.

   c. The set back line shall be established behind the gate houses for any new construction in proposed for the front the of the two dependencies attached to the NHL buildings

   d. The rod iron fence that runs along Greys Ferry Avenue in front of Biddle Hall shall be retained. And,

   e. The larger number of units shall be constructed in the rear of the U.S. Naval Home site so as to limit the density within the Approval Area, which includes the three NHL Buildings.

2. *The two dependency buildings attached to the NHL buildings shall be preserved and rehabilitated.*

3. *All rehabilitation activities proposed for the three NHL Buildings and their dependencies shall adhere to the recommended approaches in the* ***Standards****, unless the Pennsylvania SHPO provides prior written permission to the covenantee to modify the* ***Standards*** *for the treatment of significant features and materials.*

Toll Brothers, Inc.

Quality Homes By Design®

VIA FEDERAL EXPRESS

November 14, 1997

Ms. Charlene Dwin Vaughan
Advisory Council on Historic Preservation
1100 Pennsylvania Avenue, N.W.
Room 809
Washington, DC 20004

Mr. Brent D. Glass
Executive Director
Pennsylvania Historical and
Museum Commission
Third and North Streets
Harrisburg, PA 17108-1026

Re: Philadelphia Naval Home
Site Plan Approval

Dear Ms. Vaughan and Mr. Glass:

Thank you for your quick response to the proposed Amendment to the Covenants. At this point we feel that it would be more expeditious to move directly to the plan approval.

Enclosed is a copy of the site plan for which we are seeking your approval. This site plan is the result of numerous meetings and presentations with several agencies including the meeting that both of you participated in which took place at the Naval Home on October 8, 1997.

I would appreciate your immediate attention so that we may proceed as quickly as possible. Should you need any additional information please feel free to call me at 215-938-8246. Thank you for your attention to this matter.

Very truly yours,

TOLL BROTHERS, INC.

Andrew Terhune

AT:aer
Enclosure

cc: Herbert Vederman, Deputy Mayor for Economic Development
Don L. Klima, Director, Office of Planning and Review, ACHP
Zvi Barzilay

New York Stock Exchange • Symbol TOL
Corporate Office: 3103 Philmont Avenue, Huntingdon Valley, PA 19006
(215) 938-8000

Advisory Council On Historic Preservation

The Old Post Office Building
1100 Pennsylvania Avenue, NW, #809
Washington, DC 20004

81-0200-101

November 26, 1997

RECEIVED
DEC 2 3 1997
HISTORIC PRESERVATION

Mr. Andrew Terhune
Toll Brothers, Inc.
3103 Philmont Avenue
Huntingdon Valley, PA 19006

REF: U.S. Naval Home
Philadelphia, Pennsylvania

Dear Mr. Terhune:

Thank you for submitting a copy of the proposed site plan and zoning plan developed by Toll Brothers, Inc. for the referenced undertaking for the Council's review. Regrettably, the documents provided do not include sufficient information to allow us to approve Toll Brothers current development proposal for the U.S. Naval Home site. As mentioned in our November 4, 1997 letter to you, we are concerned about the future use and treatment of the three remaining National Historic Landmark Buildings and the impact redevelopment of the site will have on these properties. Accordingly, Toll Brothers will need to provide adequate background documentation that provides the basis of the proposed site plan.

In preparing the required background documentation, we recommend that Toll Brothers address the following issues.

1. Why do you feel that *it would be more expeditious to move directly to the plan approval*? (Since your transmittal letter did not respond to the Council's proposed amendment to the existing covenant, please summarize Toll Brothers' response to the recommendations set forth in our November 4th letter.)

2. We note that both the proposed site plan and zoning plan were developed on November 11, 1997 and November 13, 1997 respectively. Are they considered draft or final documents? Will these documents be submitted to the City for the required local administrative reviews? What is the proposed schedule for such reviews?

3. What factors were considered by Toll Brothers in developing the proposed site plan, i.e. market demand, topography of the site, zoning, financing, etc? Does the proposed site plan address the design guidelines outlined in Provision No. 1 of Attachment B of our proposed amendment to the existing covenant? (These design guidelines were intended to clarify for Toll Brothers the basis for obtaining approvals from the Pennsylvania State Historic Preservation Officer (SHPO) and the Council for proposed alterations, improvements and new development.)

4. Have conceptual designs of the various building types been developed? If so, please submit them to us for review.

5. Did Toll Brothers collaborate with the City of Philadelphia, particularly the Philadelphia Historical Commission, when selecting the location of various housing types? If so, what was its recommendations?

6. Has Toll Brothers secured financing to implement the proposed site plan when approved? If so, what is the time frame for project implementation? If activities are to be phased, what portions of the site will be developed during the initial phases?

7. What are Toll Brothers current plans for the rehabilitation and reuse of the three National Historic Landmark Buildings? How will the properties be integrated into the proposed redevelopment of the U.S. Naval Home site?

8. Has Toll Brothers recently contracted with structural engineers or historic architects to assess the current condition of the properties? If so, what were their findings? If not, is Toll Brothers contemplating such actions to ensure that the buildings are properly stabilized and not allowed to deteriorate by neglect?

9. Did Toll Brothers reach any agreements with preservationists following the extensive discussions with the Pennsylvania SHPO and the Preservation Alliance for Greater Philadelphia regarding the siting of buildings, the proposed density of the site, and the reuse of the three National Historic Landmark Buildings? If so, how are such agreements reflected in the proposed site plan?

10. To what extent has the local community or its elected representatives participated in the development of the proposed site plan? What comments were received regarding the proposed density and the location of various housing types on the site? (Please provide a chronology of consultation with the community)

Our last formal contact with Toll Brothers regarding the reuse of the U.S. Naval Home was in December 1985. We were quite disappointed to learn that no action was taken to implement the plan during the past decade and that the National Historic Landmark Buildings had been left

vacant with minimal stabilization activities. It is, therefore, important that we have receive adequate background information, as well as some degree of commitment from the property owner regarding the viability of proposed redevelopment activities, before we approve yet another site plan.

We look forward to receiving the additional documentation so that we can proceed with our review. Should you have any questions, please contact Charlene Dwin Vaughn, AICP, at 202-606-8505.

Sincerely,

Charlene Dwin Vaughn

for Don L. Klima
Director
Office of Planning and Review

COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION
POST OFFICE BOX 1026
HARRISBURG, PENNSYLVANIA 17108-1026

EXECUTIVE DIRECTOR

January 5, 1998

Mr. Andrew Terhune
Toll Brothers, Inc.
3103 Philmont Avenue
Huntingdon Valley, PA 19006

RE: U.S. Naval Home
Plan Approval

Dear Andrew:

I have reviewed the Zoning Plan dated November 13, 1997. I find the plans to be acceptable and hereby approve the plan as per the Covenants in the Deed dated March 9, 1988, between Toll Brothers and the GSA.

I will expect Toll Brothers to make a separate submission for approval of the exterior elevations of the low-rise structures that will face the historic structures on the site (identified as parcels "D", on the zoning map) and the high-rise structure (identified as parcel A-1 on the zoning map) and for the approval of plans and specifications for the rehabilitation of Biddle Hall, the Governor's Mansion and the Executive/Medical Officer's Quarters.

Sincerely,

Brent D. Glass

Brent D. Glass

cc: Advisory Council on Historic Preservation

Advisory Council On Historic Preservation

The Old Post Office Building
1100 Pennsylvania Avenue, NW, #809
Washington, DC 20004

98-0300-101

MAR 24 1998

RECEIVED
APR 14 1998
HISTORIC PRESERVATION

Mr. Zvi Barzilay
Executive Vice President
Toll Brothers, Inc.
3103 Philmont Avenue
Huntingdon Valley, PA 19006

REF: U.S. Naval Home
Philadelphia, Pennsylvania

Dear Mr. Barzilay:

Thank you for providing the additional documentation related to the redevelopment of the U.S. Naval Home. Based upon the information provided in your letter of December 5, 1997, the conditional approval of the design concept by both the Pennsylvania SHPO and the Philadelphia Planning Commission, we believe that the redevelopment strategy proposed for the U.S. Naval Home site is sympathetic to the three remaining National Historic Landmark (NHL) Buildings: Biddle Hall, the Governor's House and the Surgeon General's House. Further, we agree that redevelopment of the site will be a catalyst for much needed revitalization efforts within adjacent neighborhoods.

The Council therefore approves the Zoning Plan, dated November 13, 1997, and the Development Concept Plan, dated November 11, 1997, subject to the following conditions.

1. By no later than January 31, 2000, Toll Brothers will advise the Pennsylvania SHPO and the Council of its reuse strategy for Biddle Hall, the Governor's House, and the Surgeon General's House. Should Toll Brothers be unable to meet this deadline, it will contact the Council at least three months prior to request an extension and to summarize the status of project planning.

2. Toll Brothers will take appropriate measures to ensure that Biddle Hall, the Governor's House, and the Surgeon General's House are preserved, stabilized, and protected, particularly during site preparation and new construction activities.

3. As part of the local administrative review process, Toll Brothers will explore the feasibility of eliminating the surface parking area proposed for the front of Biddle Hall or, at a minimum, reducing, to the maximum extent feasible, the number of parking spaces.

4. Schematic designs and preliminary and final plans and specifications for construction in zoning categories A1 and D, the area adjacent to the NHL Buildings, shall be submitted to the Pennsylvania SHPO for review and comment. Should the Pennsylvania SHPO object to any of the documents, the Pennsylvania SHPO and Toll Brothers shall consult further to reach a compromise solution. If the Pennsylvania SHPO and Toll Brothers are unable to reach a compromise, Toll Brothers shall submit the plans and specifications to the Council for its recommendations

If you agree to these conditions, please sign the concurrence below and forward the original to us at the above address. A copy of the signed letter should be provided to the Pennsylvania SHPO and the Philadelphia Historical Commission for their records Should you, however, disagree with the conditions or recommend changes, please convey to us the basis of your objection(s) in order that we might attempt to resolve any differences.

Should you have any questions, please contact Charlene Dwin Vaughn at 202-606-8505. We appreciate your continued cooperation.

Sincerely,

Klima
Director
Office of Planning and Review

Concur

By:_____ Date_____
Title

Toll Brothers, Inc.

Quality Homes by Design®

Andrew Terhune
Special Projects Manager

(215) 938-8246
aterhune@tollbrothersinc.com

October 12, 1999

RECEIVED
OCT 1 4 1999
HISTORIC PRESERVATION

Ms. Brenda Barrett
Director of Bureau for Historic Preservation
Pennsylvania Historic and Museum Commission
P.O. Box 1026
Harrisburg, PA 17108-1026

Ms. Charlene Dwin Vaughn
Advisory Council on Historic Preservation
1100 Pennsylvania Avenue, N.W., #809
Washington, D.C. 20004

Re: Naval Home – Approval of Concept Plan

Dear Ms. Barrett and Ms. Dwin Vaughn :

I have enclosed a copy of the concept plan that we are proposing for the Philadelphia Naval Home. The same set has been given this week to the Philadelphia Historical Commission for the use of the Architectural Committee. It is our intention to make a presentation to the Architectural Committee at its regular monthly meeting on October 26th. Prior to meeting with the Architectural Committee, we will be having a meeting with residents of the Naval Home neighborhood. This meeting will take place on October 20th at 7:30PM at the Unity Mission Church on South 21st Street between Lombard and South Streets.

The package contains two plans, one of which is an overall concept plan and the other being a plan for phase one. Phase one, which we intend to begin immediately upon receiving the required approvals, will include the renovation of Biddle Hall, the Surgeon's residence and the Governor's residence. A new four-story multi-family building will be erected in the Northeast corner of the property containing up to 170 units. Another building will be built directly behind and attached to Biddle Hall also containing between 150 and 170 units.

Ms. Brenda Barrett
Ms. Charlene Dwin Vaughn
October 12, 1999
Page 2

The essential changes between this plan and the previous plan are:

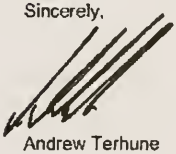
1. The building at the Northeast corner, which had been approved as a high-rise is now proposed to be a 4-story structure of roughly the same shape.

2. The town homes, previously to the West, and directly behind Biddle Hall, have been replaced by a building to be attached to Biddle Hall. This has been done to better make use of public spaces such as the rotunda available in Biddle Hall and to make them available more of the residents.

3. The town homes to the North and South of Biddle Hall near the Surgeon and Governor's residences are remaining essentially unchanged.

We would like to obtain approval of the Concept Plan as quickly as possible so we can begin the detailed architectural work that will be necessary. I would also like to suggest we include an arrangement similar to what we had with our last plan, in which the State Historic Preservation Officer was able to act for both the Historic and Museum Commission, and for the Federal Advisory Council with respect to approving the architectural plans. Thank you for your consideration. I look forward to seeing you on the 26th.

Sincerely,



Andrew Terhune

cc: Dr. Richard Tyler, Historic Preservation Officer w/o attachments
Barbara Kaplan – Executive Director, Planning Commission, w/o attachments
Herb Vederman – Deputy Mayor, Economic Development, w/o attachments
Anna C. Verna – City of Philadelphia Council President w/o attachments

ZVita\ltrletter\

81-0200-101

Advisory Council On Historic Preservation

The Old Post Office Building
1100 Pennsylvania Avenue, NW, #809
Washington, DC 20004

RECEIVED
JAN 1 8 2000
PH & MC
EXECUTIVE DIVISION

RECEIVED
JAN 2 1 2000
HISTORIC PRESERVATION

DEC - 3 1999

Mr. Andrew Terhune
Toll Brothers, Inc.
3103 Philmont Avenue
Huntingdon Valley, PA 19006

REF: Revised Concept Plan for the Development of the U.S. Naval Home
Philadelphia, Pennsylvania

Dear Mr. Terhune:

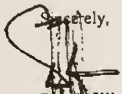
This is a follow-up to recent telephone conversations among you, the Pennsylvania State Historic Preservation Officer (SHPO), and the Council regarding the referenced undertaking. We are pleased that Toll Brothers has reduced the density of the multi-family building proposed for the northeast corner of the U.S. Naval Home site. Likewise, we commend Toll Brothers for including the rehabilitation of the National Historic Landmark (NHL) designated Strickland Buildings in the first phase of project activities. These actions fully meet the conditions which the Council outlined in its approval of the earlier design concept in 1998.

We have consistently urged the developer to preserve and reuse the NHL properties as part of the redevelopment of the site. While it is still unclear whether Toll Brothers will pursue the use of federal rehabilitation tax credits, we encourage the developer to approach the rehabilitation in a manner that preserves the architectural integrity of the Strickland Buildings and adheres to the recommended approaches in *The Secretary of Interior's Standards for Rehabilitation*. Since we have only been afforded an opportunity to review the design concept, we would like to receive copies of schematic designs and preliminary plans along with the Pennsylvania SHPO when they are completed. If we conclude from our review of preliminary plans that the proposed treatment of Biddle Hall, the Surgeon's Residence, and the Governor's Residence could result in adverse effects to these historic properties, we will confer with the National Park Service, as appropriate, regarding the affect of the treatment on the integrity, and continued designation of the buildings as an NHL. We will share our findings with Toll Brothers and the Pennsylvania SHPO, and, if necessary, consult to determine how best to avoid or minimize adverse effects.

As previously discussed with you and Mr. Zvi Barzilay, we believe that new construction and rehabilitation of historic buildings can be accomplished in a manner that does not compromise

the integrity of the NHL. The revised concept plan demonstrates your general acceptance of this goal. Accordingly, we look forward to receiving more detailed information regarding the concept in the near future.

Sincerely,



Donald Klima
Director
Office of Planning and Review

copy
DAN
Bonnie

Commonwealth of Pennsylvania
Pennsylvania Historical and Museum Commission
Post Office Box 1026
Harrisburg, Pennsylvania 17108-1026

Executive Director

RECEIVED
DEC 09 1999
BUREAU FOR HISTORIC PRESERVATION

December 8, 1999

Mr. Andrew Terhune
Toll Brothers
3103 Philmont Avenue
Huntingdon Valley, PA 19006

Re: Revised Concept Plan for the Development of the U.S. Naval Home
Philadelphia, Pennsylvania

Dear Mr. Terhune:

The Pennsylvania Historical and Museum Commission, Bureau for Historic Preservation has reviewed the revised concept plan for the development of the U.S. Naval Home in Philadelphia. This plan includes the reduction in height of the structure proposed for the northeast corner of the property and the incorporation of a new addition to Biddle Hall that is not visible from the street elevation on Bainbridge Avenue. The staging of the project to include the rehabilitation of the key landmark buildings on the property is an important first step. This concept plan meets with the approval of the Pennsylvania Historical and Museum Commission and also meets the conditions outlined by the Advisory Council on Historic Preservation in 1998.

The Bureau for Historic Preservation continues to work with your company on the use of the Federal Rehabilitation Tax Credit for the property. If we can be of further assistance in this matter, please do not hesitate to continue the close coordination with our office. The use of these tax credits would indeed insure that the Secretary of Interior Standards for Rehabilitation are incorporated into the rehabilitation of the important Strickland designed historic buildings. The next step in the review process under the terms of our covenant is the review of the project in schematic design and review of the preliminary plans. We will also continue to coordinate our consideration of this project with the Advisory Council on Historic Preservation.

We look forward to working with you on the rehabilitation of this important site for Philadelphia and the nation. If you have any further questions, please do not hesitate to give us a call.

Sincerely,

Brent D. Glass

Brent D. Glass

Commonwealth of Pennsylvania
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Post Office Box 1026
Harrisburg, Pennsylvania 17108-1026

May 23, 2000

Andrew Terhune
Special Projects Manager
Toll Brothers Inc.
3103 Philmont Avenue
Huntington Valley, PA 19006

RE: U. S. Naval Home
Grey's Ferry Avenue
Philadelphia

Dear Mr. Terhune:

Thank you for submitting the Part 2 Rehabilitation Certification Application for the proposed rehabilitation of the U. S. Naval Home in Philadelphia. Overall, the rehabilitation as proposed does not meet the Secretary of the Interior's *Standards and Guidelines for Rehabilitation* because of the serious effects to the spatial relationship of the three historic buildings and a lack of information that does not allow a better understanding of the effects that the new construction will have on Biddle Hall. And finally there is no documentation provided to justify the demolition of the rear wing of the Governor's Residence.

The proposed site plan does not preserve the spatial relationship between Biddle Hall and its dependencies, the Governor's House and the Surgeon General's House and because of the substantial projection of the 4-story building in front of the Governor's Residence. The addition of the townhouses into the open spaces between these three buildings does not preserve this significant design relationship. Preserving this spatial relationship was specifically required in the previously approved project. Any new building/units must be kept behind the front elevation of both the Governor's and Surgeon General's Houses and the proposed townhouses be kept behind the rear facade of the north and south wings of Biddle Hall. This relationship was depicted on the site plan submitted as part of the Part 2 Rehabilitation Certification submitted in August 1984 and subsequently approved by the National Park Service August 14, 1984.

We have additional concerns with the design of the new (rear) wing to Biddle Hall. The proposed new design should not reference architectural styles that do not have historical association with the Naval Home. We suggest that you use architectural references that better reflect the Naval Home's Classically inspired design. Additionally, the massing of the addition should be recessed at least 2 feet behind the plane of the wings of Biddle Hall. There is also insufficient information to understand how the connections between the new wing and Biddle Hall will be handled at both the roofline and where the wing is joined by the stair towers. Since there are floor level differences between the new addition and Biddle Hall, we have concerns about what impact these connections will have on Biddle Hall. The drawings also suggest serious differences/incompatibility in roofing material/treatment, including a substantial number of chimneys and skylights/dormers.

Finally, a structural engineer's report must substantiate the need to demolish the rear wing of the Governor's Residence.

It is our opinion that the National Park Service would not entertain this application because there is so much missing information. Our office would not be comfortable submitting the material particularly since we would recommend denial (1) for lack of information and (2) for proposing to add new buildings into the landscape where they were specifically excluded in the previous (1984) proposal.

If you have any questions, please feel free to contact me at (717) 787-0772

Sincerely,

Dan G. Deibler, Chief
Preservation Services Division

Cc File
Dr. Brent Glass

Toll Brothers, Inc.
Quality Homes by Design®

Andrew Terhune
Special Projects Manager

(215) 938-8246
aterhune@tollbrothersinc.com

RECEIVED
MAY 30 2000
HISTORIC PRESERVATION

May 24, 2000

Mr. Dan G. Deibler, Chief
Preservation Services Division
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
P.O. Box 1026
Harrisburg, PA 17108-1026

Re: U.S. Naval Home - Grey's Ferry Avenue, Philadelphia

Dear Mr. Deibler:

Thank you for your response and comments on our Part 2 Rehabilitation Certification Application for the U.S. Naval Home. We appreciate your taking the time to outline your concerns.

We are requesting that you forward the Application, as is, to the National Park Service for their review. We understand that there may be some issues about which the Park Service may be concerned. Nevertheless, we would like the Park Service to have the opportunity to review the current plan and respond directly.

Please feel free to contact me at the above phone number or e-mail address.

Sincerely,

Andrew Terhune

cc: Mitch Kotler

New York Stock Exchange • Symbol TOL
Corporate Office 3103 Philmont Avenue, Huntingdon Valley, PA 19006
(215) 938-8000
www.tollbrothers.com

Form 10-168a
Feb 1992

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

Historic Preservation Certification Application
State Historic Preservation Office Review & Recommendation Sheet
Rehabilitation—Part 2/Part 3

Project Number: _____

NUMBER 1

U. S. Naval Home

24th Street and Gray's Ferry Road
(Property)
Philadelphia, PA

Certified Historic Structure? X yes _____ pending
NHL

Type of Request: X Part 2
_____ Part 3 (Part 2 previously reviewed)
_____ Part 3 (Part 2 not previously reviewed)
_____ Amendment

Date application received by State 4-19-00

Date(s) additional information requested by State 4-26-00, 5-23-00,
_____, _____, _____, _____, _____

Complete information received by State 5-24-00

Date transmitted to NPS 5-31-00

Property visit by State staff 1-10-00 _____ _____ rehab.
(before) (during) (after)

X Preliminary done
_____ Non-standard billing

SHPO SUMMARY REVIEW

X Fully reviewed by SHPO

___ No outstanding concerns

X Owner informed of SHPO recommendation

___ In-depth NPS review requested

NUMBER 2

STATE RECOMMENDATION:

Bonnie Wilkinson, who meets the Secretary of the Interior's Professional Qualification Standards, reviewed this application.

The project
___ meets the Standards.

___ meets the Standards *only* if the attached conditions are met.

X does not meet Standard number(s) 1 for the reasons listed on reverse.

X warrants denial for lack of information.

___ This application is being forwarded without recommendation.

For completed work previously reviewed, check as appropriate:
___ completed rehabilitation conforms to work previously approved.

___ completed rehabilitation differs substantively from work previously approved (describe divergences from Part 2 application on reverse)

May 31, '00 Bonnie Pfister
Date State Official Signature

This is a review sheet only and does not constitute an official certification of rehabilitation

NUMBER 3 ISSUES:

___Additions, including rooftop

___Alteration, removal, or covering of significant interior finishes or features

___Changes to significant interior spaces or plan features (including circulation patterns)

_X_Damaging or inadequately specified masonry treatments cleaning, repointing,

___Alteration of significant exterior features or surfaces

_X_Adjacent new construction, extensive site work, or demolition of adjacent structures

___Window replacements on any major elevation that do not match historic configuration, material, and profiles

_X_Other (explain) No information to justify demolition of rear wing of Governor's Residence.

NUMBER 4 Basis for Recommendation. Focus on how the issues checked in NUMBER 3 are being addressed. Where denial is recommended, explain fully. Comment on noteworthy aspects of the project, including any technical or design innovations, or creative solutions

STATE EVALUATION OF PROJECT & CONCERNS. The enclosed application covers the proposed rehabilitation to U. S Naval Home complex, which was listed as a NHL on June 16, 1972. The project consists of the rehabilitation of Biddle Hall; the stabilization of the Governor's and Surgeon General's Residences (including the removal of the rear wing to the Governor's residence); the construction of an addition to Biddle Hall; and the construction of townhouses and 4-story multi-family units throughout the site. A previous Part 2 application received preliminary determination with conditions on October 17, 1985. This proposed project was not undertaken.

BHP is forwarding this application with the recommendation of denial that the proposed project does not meet the Secretary of the Interior's *Standards for Rehabilitation* for three reasons. First, the construction of townhouses destroys the spatial relationship of the three historic buildings. Secondly, the lack of complete information does not allow an overall understanding of the effects that the new construction (addition) will have on Biddle Hall. And finally, there is no documentation provided to justify the demolition of the rear wing of the Governor's Residence.

The proposed site plan does not meet Standard 1. Standard 1 notes "A property shall be used for its historic purpose or be placed in a new use that requires *minimal change to the defining characteristics of the* building and

INNOVATIVE SOLUTIONS/NOTEWORTHY ASPECTS.
__ new technical process ___ creative design solution ___ noteworthy project

___ See attachments: _____ plans _____ specifications _____ photographs _____ other:
___ Items sent separately _____ plans _____ specifications _____ photographs _____ other:
___ Other documentation on file in State:

NPS COMMENTS

Date National Park Service Reviewer

State evaluation of Project and Concerns
Cont'd

its site and environment." The proposed new construction does not preserve the spatial relationship between Biddle Hall and its dependencies, the Governor's Residence and the Surgeon General's Residence. The addition of the townhouses into the open spaces between these three buildings does not preserve this significant spatial relationship. Preserving this spatial relationship was specifically required in the previously approved project. This relationship was depicted on the site plan submitted as part of the Part 2 Rehabilitation Certification submitted in August 1984 and subsequently approved by the National Park Service August 14, 1984. The location of the new townhouse construction (near Surgeon General's Residence) and the projection/tongue of the 4-story multi-family building in front of the Governor's Residence does not protect the integrity of the historic structures. The location of these buildings destroys the historic connections between these buildings. Additionally, the increased parking disrupts the parade ground.

The lack of complete information does not allow an overall understanding of the design for the new addition and what its effect will be on Biddle Hall. There is also insufficient information to understand how the connections between the new wing and Biddle Hall will be handled at both the roofline and where the stair towers join each wing. The drawings also suggest serious differences/incompatibility in roofing material/treatment, including a substantial number of chimneys and skylights/dormers. Furthermore, there isn't any information on how the balance of the site will be developed including phasing and design. Finally, a structural engineer's report must substantiate the need to demolish the rear wing of the Governor's Residence.

Based on our review of the overall project, the Bureau for Historic Preservation is recommending that the proposed project be denied for not meeting Standards 1 and 9, and for the lack of complete information.

06-27-00 TUE 10:24 FAX 002

United States Department of the Interior

NATIONAL PARK SERVICE
1849 C Street, N.W.
Washington, D.C. 20240

IN REPLY REFER TO:

H30(2255)

June 26, 2000

Mr. Andrew Terhune
Toll Brothers, Inc.
3103 Philmont Avenue
Huntingdon Valley, PA 19006

PROPERTY: U. S. Naval Home, 24th Street and Grays Ferry Avenue, Philadelphia, PA
PROJECT NUMBER: 5964
TAXPAYER ID NUMBER: 23-2417123

Dear Mr. Terhune:

The National Park Service has reviewed your Historic Preservation Certification Application – Part 2 and has determined that the rehabilitation does not meet Standards 1, 2, 5 and 9 of the Secretary of the Interior's Standards for Rehabilitation. Therefore, this project does not qualify as a certified rehabilitation and is not eligible for the 20% investment tax credit for historic preservation. Because this property is a certified historic structure, it is also not eligible for the 10% tax credit for the rehabilitation of older non-historic buildings.

The U. S. Naval Home, a National Historic Landmark, occupies a nearly 21-acre site in Center City Philadelphia. Historic buildings on the site include the temple-fronted Biddle Hall (1830), the Surgeon General's and Governor's Houses (both 1844) and two gatehouses. Designed by noted 19th-century architect William Strickland, these buildings are arranged symmetrically facing and parallel to Grays Ferry Avenue. The Naval Home has been vacant for nearly 25 years. Abandoned by the U. S. Navy, the site was declared a surplus property. Your firm has controlled the property, either through an option or ownership, since 1983. Following lengthy negotiations, the National Park Service issued a conditional approval that a proposed rehabilitation of the buildings and site would meet the Secretary of the Interior's Standards on October 17, 1985. That proposal included demolition of many other buildings on the site and substantial new construction. The buildings have been demolished in the intervening 15 years, but no rehabilitation work on the historic structures and no new construction have occurred.

The revised rehabilitation proposal received in this office on June 1, 2000 describes the first phase of a three-phase project. The proposal is substantially different from the proposal that received conditional approval in 1985. In these points of differentiation, the revised proposal fails to meet the Standard 1, which requires that a property be placed in a new use that requires minimal change to buildings and their sites and environments and Standard 9, which requires that additions and new construction must be compatible with the massing, size and scale of a property and its environment.

As shown on the 1985 site plan, proposed new construction consisted of buildings placed individually throughout the site. The new buildings were sited so as to be distinctly separate from and not impede views of

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the historic buildings. The original Part 2 application stated, "No building adjacent to Biddle Hall is sited in front of its centerline axis and the view of Biddle Hall from Gray [sic] Ferry Avenue will be retained." Placement of several new structures in the Bainbridge Street/Grays Ferry Avenue corner of the site was of particular concern during our review of the initial rehabilitation proposal. This office specifically required that any buildings in that location must be placed totally behind the Governor's House in order to preserve the spatial relationship between Biddle Hall and its dependencies.

In the revised rehabilitation proposal, the new construction has become massive multi-family structures and groupings of connected townhouses rather than individual structures within the site. The new construction appears to be at least twice as dense as the original proposal. Four-story townhouses will be constructed in front of the centerline axis of Biddle Hall and will envelope both the Surgeon General's and the Governor's Houses. A large multi-story, multi-family building occupies the entire Bainbridge Street/Grays Ferry Avenue corner and projects southward in front of the Governor's House; a group of townhouses at the southeast corner of the site completes the enclosure of the Surgeon General's House.

The size, scale and density of this new construction violate Standards 1 and 9. It destroys the spatial relationships among these three historic buildings, impinges on the view of Biddle Hall from Grays Ferry Avenue and forecloses the historic views of the building group from all vantage points. The individual placement of buildings in the 1985 plan understated the size and density of the new construction while preserving some open space within the site. The solid groupings of buildings in the 2000 plan emphasizes their mass and density and obliterates virtually all open space within the site.

A second deviation from the conditionally approved 1985 plan that violates Standards 1 and 9 is the very large addition proposed for Biddle Hall, the keystone of this National Historic Landmark site. The addition overwhelms the historic building, more than doubling it in size, rising above it in height and connecting to it at three points. The addition is in no way compatible with Biddle Hall and is particularly egregious in light of the fact that plans for the western half of the site remain undefined at this time. Additional residential units could be accommodated in new construction on the Schuylkill Avenue side of the property. Biddle Hall, along with its dependencies, must retain its historic configuration and character.

The revised Part 2 requests approval of greater density of new construction with a consequent greater impact on the historic buildings and site and in the absence of concrete plans for half of the site. The revised proposal adds density to the eastern half of the site far above that which was approved in the 1985 plan, while leaving open the possibility that Phases 2 and 3 to develop the western half of the site may or may occur. This office has consistently advised that additional new construction will only meet the Standards if it is concentrated on the western half, the rear, rather than the front of the site. This office first reviewed the revised site plan in November 1999 and brought these concerns to your attention at that time; we reiterated our concerns to your historic preservation consultant in February 2000. The purpose of these preliminary consultations was to provide guidance as to how to bring the project into conformance with the Standards, but the site plan submitted as part of the revised Part 2 is identical to the one presented in November 1999.

The revised proposal also raises new issues not included in the 1985 proposal and not in conformance with the Standards. The Part 2 application states that new Building A, the large multi-family building in the Bainbridge Street/Grays Ferry Avenue corner, will replace the existing wall. No further description is given, but the statement implies that the existing perimeter stone wall and fence are to be demolished and that the new multi-story building will form the site perimeter at this point. The wall and fence are character defining features of the site, and their demolition would violate Standards 2 and 5, which requires that the historic character, materials and distinctive features of a property be preserved.

The revised proposal also includes removal of the wing on the Governor's Residence. The purpose of this demolition appears to be to accommodate parking or additional townhouses. Removal of this wing will diminish the historic character and materials of the building, in violation of Standard 2.

Even in the absence of the issues cited above, the National Park Service would be unable to determine that this rehabilitation proposal meets the Standards, due to a substantial lack of information in the Part 2. The design and materials of the new construction, detailed rehabilitation plans (with existing and proposed drawings) for Biddle Hall, treatments of historic materials (masonry cleaning and pointing, windows), and specific stabilization work on the Surgeon General's House and the Governor's House, are not described in the application. Phases 2 and 3, concepts of which appear on the proposed site plan, are also omitted. Without a more comprehensive description of the overall rehabilitation, as required by program regulations, we cannot determine whether major components of the project meet the Standards.

You may appeal this decision by writing to the Chief Appeals Officer, Cultural Resources, National Park Service, Room NC300, 1849 C Street, NW, Washington, D.C. 20240, addressing the concerns raised in this letter. Federal regulations governing the investment tax credit program provide additional information about the appeal process in section 67.10. A copy of this decision letter will be sent to the Internal Revenue Service.

If you have any questions about the review of the application, please contact Rebecca Shaffer of this office at 202-343-1146.

Sincerely,

Sharon C. Park

Sharon C. Park, FAIA
Chief, Technical Preservation Services

cc: PA SHPO
IRS

IN REPLY REFER TO

United States Department of the Interior

NATIONAL PARK SERVICE
1849 C Street, N.W.
Washington, D.C. 20240

H4215(2255)

NOV 28 2000

Mr. Andrew Terhune
Toll Brothers, Inc.
3103 Philmont Avenue
Huntingdon Valley, PA 19006

Re: **U.S. Naval Home, 24th Street and Grays Ferry Avenue, Philadelphia, PA**
Project Number: **5964**
Taxpayer's Identification Number: **23-2417123**

Dear Mr. Terhune:

My review of your appeal of the decision of the Technical Preservation Services Branch, National Park Service, denying certification of the rehabilitation work on the property cited above has been concluded. The appeal was made in accordance with Department of the Interior regulations (36 CFR Part 67) governing certifications for Federal income tax incentives for historic preservation as specified in the Internal Revenue Code of 1986. I wish to thank you and your associates for meeting with me in Washington on September 20, 2000, and for providing a detailed account of the factors in the project.

After careful review of the full record in this case, including the additional information supplied with your letter of October 2, 2000, which I received on October 12, 2000, I have determined that the proposed rehabilitation of the U.S. Naval Home is not consistent with the historic character of the property, and that the project does not meet Standards 1, 2, 6, and 9 of the Secretary of the Interior's Standards for Rehabilitation. Therefore, the denial issued on June 26, 2000, by the Technical Preservation Services Branch is hereby affirmed. I also note the official recommendation of the Pennsylvania Historic and Museum Commission on file with the National Park Service for this application: that recommendation also finds that the project as proposed does not meet the Secretary of the Interior's "Standards for Rehabilitation." However, I have further determined that the project could be brought into conformance with the Standards if the project were to be modified as described below. My decision applies both to the proposal reviewed by the Technical Preservation Services Branch and to the slightly modified proposal (dated May 3, 2000) presented at our meeting and shown in the schematic plan enclosed with your October 2, 2000, letter. Both plans depict the overall layout of the existing and proposed buildings. These plans show the siting of the proposed buildings but not the details of their construction, nor any proposed future treatments of the historic buildings themselves. Accordingly, the specific prescriptions set forth below for bringing the project into conformance with the Standards for Rehabilitation apply only to the siting of the proposed buildings described in these plans.

Built 1827-1833, with additions in 1844, the U.S. Naval Home was listed in the National Register of Historic Places on August 21, 1972. In recognition of its significance in history and architecture, it

achieved designation as a National Historic Landmark on January 7, 1976. The property served the U.S. Navy until 1976 as a home for retired sailors. Designed by William Strickland, the U.S. Naval Home is described in the National Historic Landmark documentation as "one of Strickland's outstanding commissions" and as "one [of] the most important of Philadelphia's masterpieces."

Surplussed by the Federal government, the property has been the subject of several reuse proposals over the years. One of these, advanced by Toll Brothers, Inc., called for the rehabilitation of Biddle Hall, the Governor's House, and the Surgeon General's House, and the construction of several new buildings on the property. After much consideration, including site visits and the review of multiple submittals, the National Park Service approved a rehabilitation proposal with conditions on October 17, 1985. That approval ensured that the basic overriding historic character of this nationally significant property, established by the monumental front of Biddle Hall, by its relationship to the Governor's and Surgeon General's Houses, and by the expanse of open ground in front of these structures, would be preserved. In view of this understanding of the property's significance and historic character, it was the view of the National Park Service that no buildings could be constructed in front of Biddle Hall, and that the historic view of Biddle Hall and its dependent structures from Grays Ferry Avenue had to be maintained

This rehabilitation never took place, and the property has stood vacant since then. In 1999 Technical Preservation Services, National Park Service, received a new application for the property. Throughout its review, Technical Preservation Services took as its starting point the application that was approved with conditions in 1985. However, the new proposal received in 1999 differed from the previous one in several respects. It called for the insertion of new buildings in front of Biddle Hall and between Biddle Hall and the two major flanking buildings. It also proposed a new addition to Biddle Hall, the demolition of the wing on the Governor's House, and the demolition of portions of the perimeter stone wall around the property. For these reasons, the new proposal was found not to meet the Standards for Rehabilitation in a letter dated June 26, 2000. That letter also cited the lack of information concerning key aspects of the proposal, including the design and materials of the new construction, detailed rehabilitation plans for Biddle Hall, treatments of historic materials (masonry cleaning, pointing, and windows), and stabilization work on the Governor's and Surgeon General's Houses.

In making my decision in this case, I agree with the reasoning established in the 1985 review by the National Park Service, and reaffirmed in the decision dated June 26, 2000: no new construction can be permitted that impairs the front of Biddle Hall, that compromises the relationship between this building and its dependencies, or that intrudes on the view of Strickland's masterwork from Grays Ferry Avenue. Accordingly, I must conclude that the new construction proposed by the current scheme presented at our meeting and dated May 3, 2000, fails to meet Standards 1, 2, and 9. Standard 1 states, *A property shall be used for its intended historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.* Standard 2 states: *The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.* Standard 9 states: *New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.* The principal objections here are to the buildings proposed between Biddle Hall and the Governor's and Surgeon General's Houses, to the row of townhouses at the southern corner of the site, and to the wing of the new building at the corner of Grays Ferry Avenue and Bainbridge Street that projects in front of the Governor's House. These proposed new elements would fail to preserve the key components of the historic character of the property identified in previous reviews. By requiring so much new construction, the new use to be given the property in this rehabilitation would impair the overall site and environment of these historic buildings, thereby contravening Standard 1. By impairing the monumental front of the property, the new construction would greatly alter a feature that has historically characterize[d] the

property, in dramatic violation of Standard 2. And by altering the relationship of the historic buildings to each other and to the site as a whole, the new buildings would not protect the historic integrity of the property and its environment as required by Standard 9.

I also find that the proposed demolition of the rear wing of the Governor's House fails to meet Standard 2 (cited above) and Standard 6: *Deteriorated historic features shall be repaired rather than replaced Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities, and where possible, materials Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence* This wing is an integral part of this historic structure, and no evidence was presented to indicate the kind of advanced structural deterioration that would justify demolition.

In general, other factors cited in the June 26, 2000, letter have not entered into the decision announced here. The proposed addition to Biddle Hall will not further diminish the historic character of the building. It is sited at the rear, and it meets the historic building where a previous wing once connected. It will not be readily visible from the front, nor does it reorient the building. And during our meeting you represented your intent to keep the perimeter stone wall; accordingly, based on this representation, this issue is not a factor here.

While the proposed project cannot be approved in its present state as meeting the Standards for Rehabilitation, I believe a proposal could be approved provided several conditions were met. Foremost among these is that the buildings and wing cited above must be eliminated; the rest of the new buildings indicated on the plan could be constructed, including the building proposed for the Grays Ferry Avenue/Bainbridge Street corner, if modified. This building is large, but does not compromise the key features of the site, except for the wing near the gatehouse that projects in front of the Governor's House. A second condition is that the rear wing on the Governor's House must be retained. And the perimeter wall must also be retained, as you have indicated you intend to do.

Moreover, any revised application, to be approved, must also satisfactorily address the matters cited at the conclusion of the previous National Park Service decision. The most important of these is the proposed rehabilitation of Biddle Hall itself, as well as the other issues pertaining to any specific rehabilitation project, such as windows and masonry cleaning and repointing. I also note the lack of specificity regarding the materials, color, design, and height of the additions and new construction proposed for this historic property. The site plans, renderings, and other material presented in the most recent application and at our meeting leave many questions unanswered, and my decision that the addition to Biddle Hall and a number of new buildings can be built on the property does not extend to these facets of the new construction, but rather to the footprints of these new elements only. Moreover, any plan for work on Biddle Hall and the other structures must also satisfy all of the other "conditions and understandings" set forth in the October 17, 1985, letter culminating several years' worth of National Park Service review and negotiations regarding these buildings. Those negotiations dealt with matters not covered in our meeting, such as the size of parking areas in front of Biddle Hall, and the agreements reached on them must be kept. These matters must be treated with great sensitivity, given the degree of change that has already been accepted for this property. Accordingly, any further diminishment of the historic character of this National Historic Landmark in these other aspects of proposed project work could render it impossible to approve any future proposal.

If you choose to modify the project to meet the objections to certification cited above, you should submit any new proposals to the Pennsylvania Historic and Museum Commission and through that office to the Technical Preservation Services Branch, National Park Service. As it stands, however, the project does not qualify for the Federal income tax credit for historic preservation. As Department of the Interior Regulations state, my decision is the final administrative decision regarding rehabilitation certification. A

copy of this decision will be provided to the Internal Revenue Service. Questions concerning specific tax consequences of this decision or interpretations of the Internal Revenue Code should be addressed to the appropriate office of the Internal Revenue Service.

Sincerely,

E. BLAINE CLIVER

E. Blaine Cliver
Chief Appeals Officer
Cultural Resources

cc: SHPO-PA
IRS

BIBLIOGRAPHY

General

Akst, Daniel. "House of Girth." *Philadelphia Magazine*, 92:4 (April 2001): 94 - 97, 101 - 105.

Austin, Richard L. Adaptive Reuse: Issues and Case Studies in Building Preservation. New York: Van Nostrand Reinhold, 1988.

Birch, Eugenie Ladner and Douglass Roby. "The Planner and the Preservationist." *Journal of the American Planning Association*, (Spring 1984): 194 - 207.

Brierton, Joan Mary. *Preservation Planning: An Approach to Land Use Management: The Kings Park Psychiatric Center, Long Island, New York.* Thesis (M.S. in Historic Preservation -- University of Pennsylvania, 1992.

Campagna, Barbara A. *Adaptive Reuse Study of the Buffalo State Hospital Designed by Henry Hobson Richardson*, Thesis (M.S. in Historic Preservation) -- Columbia University, 1986.

Chitty, Gill and David Baker. Managing Historic Sites and Buildings. New York, NY: Routledge, 1999.

Dean, Andrea Oppenheimer. "The Ongoing Challenge." *Architectural Record*, 185 (February 1997): 104 - 105.

Fitch, James Marston. Historic Preservation: Curatorial Management of the Build World. New York: McGraw-Hill Book Company, 1982.

Fisher, Charles E. "Historic Preservation Tax Incentives Program: The First 20 Years." *Cultural Resource Management*, 20:6 (1997): 5 - 7.

Goldwyn, Andrea Merill. *Demolition by Neglect: A Loophole in Preservation Policy.* Thesis (M.S. in Historic Preservation) -- University of Pennsylvania, 1995.

Holleran, Michael. Boston's 'Changeful Times' Origins of Preservation and Planning in America. Baltimore: Johns Hopkins University Press, 1998.

Lynch, Kevin and Gary Hack. Site Planning. 3d ed. Cambridge, MA: The MIT Press, 2000.

National Park Service. *The Secretary of the Interior's Standards for Rehabilitation.* Washington, DC: US Department of the Interior, National Park Service, Preservation Assistance Division, 1976, revised 1990.

_____. *Federal Tax Incentives for Rehabilitating Historic Buildings.* Washington, DC. US Department of the Interior, National Park Service, Heritage Preservation Division, June 2001.

Map Collection. Free Library of Philadelphia. Philadelphia, PA.

McGrath, Heather. *Sea View Hospital: The Identification of Potential Models for the Rehabilitation and Reuse of Abandoned Large Scale Hospital Complexes in New York.* Thesis (M.S. in Historic Preservation) -- University of Pennsylvania, 2001.

Rypkema, Donovan D. The Economics of Historic Preservation: A Community Leader's Guide. Washington, DC: National Trust for Historic Preservation, 1994.

Schneekloth, Lynda H., Marcia F. Feuerstein, and Barbara A. Campagna. Changing Places: Remaking Institutional Buildings. Fredonia, N.Y.: White Pine Press, 1992.

Smith, Christen Denise. *Fort Sheridan, Illinois: An Analysis of its Significance, its Closure, and Possible Alternative Uses.* Thesis (M.S. in Historic Preservation) -- University of Pennsylvania, 1991.

Tatum, George. Penn's Great Town. Philadelphia: University of Pennsylvania Press, 1961.

Tyler, Norman. Historic Preservation: An Introduction to its History, Principles, and Practice. New York: W.W. Norton, 2000.

White, Bradford J. and Richard J. Roddewig. "Preparing a Historic Preservation Plan." *Planning Advisory Service Report. No. 450.* American Planning Association, 1994.

Wodehouse, Lawrence. "John McArthur, Jr." *Journal of the Society of Architectural Historians,* 28:4 (December 1969): 271 - 283.

Interviews

Auer, Michael, *National Park Service, Washington, DC.* Interview with author, March 26, 2002

Cotton, Randall. *Preservation Alliance for Greater Philadelphia.* Interview with author, January 15, 2002.

Deibler, Dan. *Pennsylvania Historical and Museum Commission.* Interview with author, February 5, 2002.

Knapton, David. *Philadelphia Planning Commission.* Interview with author, October 12, 2001.

Terhune, Andrew. *Toll Brothers, Inc.* Interview with author, October 16, 2001.

Dwin Vaughn, Charlene. *Federal Advisory Council on Historic Preservation.* Interview with author, January 31, 2002.

Wilkinson-Mark, Bonnie. *Pennsylvania Historical and Museum Commission.* Interview with author, February 5, 2002.

Newspaper Articles

Austin, Gene. "Naval Home plan delayed but still alive." *The Philadelphia Inquirer.* July 1, 1984.

_____. "An old salts' home may get new life." *The Philadelphia Inquirer.* January 23, 1983.

Avery, Ron. "Plans for Naval Home moving." *Philadelphia Daily News.* October 29, 1997.

Burton, Cynthia. "Divine intervention on Naval Home," *The Philadelphia Inquirer.* April 16, 1998.

Cipriano, Ralph. "Naval Home's Neighbors say the site is going to seed," *The Philadelphia Inquirer.* June 10, 1996.

Dubin, Murray. "Decision time for landmark old home." *The Philadelphia Inquirer.* November 20, 1980.

Eisner, Jane. "Navy home plan gets a go-ahead." *The Philadelphia Inquirer.* January 6, 1983.

Ferrick, Jr., Thomas. "Developing a sense of history," *The Philadelphia Inquirer.* January 11, 1998.

Frisby, Mister Mann. "1,200 homes eyed." *Philadelphia Daily News.* January 9, 1998.

Germanotta, Tony. "City, Neighbors Plan Future of Naval Home. *Welcomat.* October 4, 1978.

Gordon, Dianne C. "It's the Better Way to Go." *The Evening Bulletin.* Sept. 7, 1978.

Hine, Thomas. "Floating a plan for Naval Home land." *The Philadelphia Inquirer.* April 3, 1994.

_____. "At Naval Home, anchors decay." *The Philadelphia Inquirer.* December 2, 1990.

_____. "Demolition approved at Naval Home." *The Philadelphia Inquirer.* April 14, 1988.

_____. "Home-building firm buys U.S. Naval Home." *The Philadelphia Inquirer.* March 19, 1988.

_____. "Naval Home: Historical Dilemma," *The Philadelphia Inquirer.* January 3, 1988.

_____. "The Naval Home: A national treasure that needs help." *The Philadelphia Inquirer.* August 3, 1980.

_____. "Old Buildings." *The Philadelphia Inquirer.* October 19, 1975.

_____. "The Naval Home: Let it Stand, and Stand it Will." *The Philadelphia Inquirer.* November 10, 1974.

Klibanoff, Hank. "Development, with redevelopment." *The Philadelphia Inquirer.* January 21, 1983.

McCaffrey, J.D. "City Again Seeks Naval Home for Recreation Site." *The Evening Bulletin.* April 25, 1978.

Roberts, Jamie Cohen. "Home's cobwebs, not wrecking ball, feared." *Philadelphia Business Journal.* June 12 - 18, 1989.

Slobodzian, Joseph A. "Developer threatens to sue city over Naval Home permits." *The Philadelphia Inquirer.* December 31, 1987.

_____. "Firm told to settle plans for Naval Home by March." *The Philadelphia Inquirer.* December 8, 1987.

Young, Earni. "Navy Home rehab." *The Philadelphia Daily News.* January 27, 1994.

Sources for the Naval Home

McNamara, Martin H. "Restoration of US Naval Asylum Remains in Controversy." *Preservation News,* 29:9 (September 1989): 3.

Naval Home File. Pennsylvania Historical and Museum Commission, Bureau for Historic Preservation. Harrisburg, PA.

Naval Home File. Philadelphia Historical Commission. Philadelphia, PA.

Naval Home File. Preservation Alliance for Greater Philadelphia. Philadelphia, PA.

Shippen, Edward, M.D., U.S.N. "Some Account of the Origin of the Naval Asylum at Philadelphia." *Pennsylvania Magazine of History and Biography,* 7:2(1883): 117 – 142.

US Naval Home District Report and Appendices, Historic Preservation Studio, Graduate Program in Historic Preservation, University of Pennsylvania, 1987.

US Naval Home District Report, Historic Preservation Studio, Graduate Program in Historic Preservation, University of Pennsylvania, 1988.

Wallace Roberts Todd, Day and Zimmerman Associates, Hammer Siler, George Associates. U.S. Naval Home Reuse Study, 1980.

_____. U.S. Naval Home Reuse Study Technical Appendix, 1980.

Sources for William Strickland

Gilchrist, Agnes Addison. William Strickland, Architect and Engineer, 1788 – 1854. Enlarged edition. Philadelphia: University of Pennsylvania Press, 1969.

_____. "Latrobe vs. Strickland." *The Journal of the American Society of Architectural Historians*, 2:3 (July 1942): 26 - 29.

Gilliams, E. Leslie. "A Pioneer American Architect." *Architectural Record*, 23:1 (February 1908): 123 - 135.

Hall, Louise. "Mills, Strickland, and Walter: Their Adventures in a World of Science." *Magazine of Art*, 40:7 (November 1947): 266 - 271.

Jackson, Joseph. Early Philadelphia Architects and Engineers. Philadelphia: 1923.

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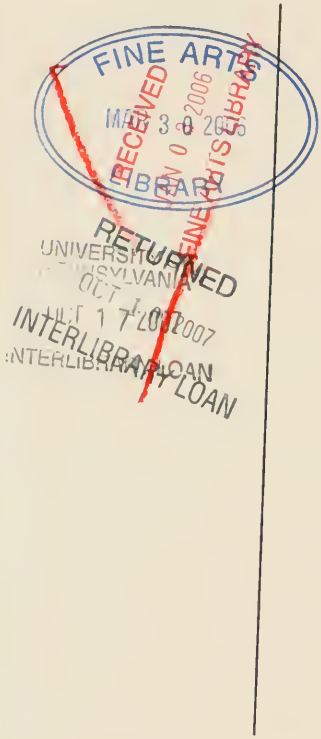

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